

EXHIBIT 35

In The Matter Of:

ASHOT EGIAZARYAN

v.

PETER ZALMAYEV

ASHOT EGIAZARYAN - Vol. 2

January 19, 2012

***REDACTED FILE
CONFIDENTIAL PORTIONS
BOUND SEPARATELY***

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

ASHOT EGIAZARYAN,

Plaintiff,

Civil Action No.

11 CIV 2670

-against-

ATTORNEYS' EYES ONLY

VOL. 2

PETER ZALMAYEV,

Defendant.

-----x

REDACTED FILE

CONFIDENTIAL PORTIONS BOUND SEPARATELY

January 19, 2012

10:05 a.m.

Continued videotaped deposition of
ASHOT EGIAZARYAN, pursuant to notice, at
the offices of Salisbury & Ryan LLP, 1325
Avenue of the Americas, New York, New
York, before Gail F. Schorr, a Certified
Shorthand Reporter, Certified Realtime
Reporter and Notary Public within and for
the State of New York.

Page 232	Page 234
<p>1 A P P E A R A N C E S: 2 FLEMMING ZULACK WILLIAMSON ZAUDERER LLP Attorneys for Plaintiff 3 One Liberty Plaza New York, NY 10006 4 BY: JONATHAN D. LUPKIN, ESQ. 5 JASON T. COHEN, ESQ. -and- 6 MARK C. ZAUDERER, ESQ. (jlupkin@fzwz.com) 7 (jcohen@fzwz.com) (mzauderer@fzwz.com) 8 9 HAMBURG & GOLDEN, P.C. Attorneys for Defendant 10 1601 Market Street, Suite 3310 Philadelphia, PA 19103-1443 11 BY: JAMES P. GOLDEN, ESQ. 12 (goldenjp@hamburg-golden.com) 13 14 SALISBURY & RYAN LLP Attorneys for Defendant 1325 Avenue of the Americas 15 New York, New York 10019-6026 16 BY: ANDREW J. RYAN, ESQ. (ar@salisburyryan.com) 17 18 MURANOV, CHERNYAKOV & PARTNERS Attorneys for Defendant 19 Bld. 6, 23 Denisovsky Lane Moscow, Russian Federation, 105005 20 BY: ALEXANDER MURANOV, ESQ. 21 (a.muranov@rospravo.ru) 22 ALSO PRESENT: 23 VALERII M. SCHUKIN, Interpreter 24 IGOR VESLER, Check Interpreter 25 RYAN McMULLEN, Videographer</p>	<p>1 ASHOT EGIАЗARYAN 2 called as the interpreter in this 3 action, resumed, having been 4 previously sworn. 5 IGOR VESLER, 6 called as the check interpreter 7 in this action, resumed, having 8 been previously sworn. 9 ASHOT EGIАЗARYAN, 10 resumed, having been previously 11 duly sworn, was examined and 12 testified through the interpreter 13 further as follows: 14 MR. GOLDEN: Would you mark 15 this. 16 (Exhibit 144 for 17 identification, Bates stamped PZ 18 003439, 3418 and 3415.) 19 MR. GOLDEN: Mr. Translator, 20 would you please translate for the 21 witness the first page of Exhibit 22 144. 23 THE INTERPRETER: The very 24 first page, this one? 25 MR. GOLDEN: Yes.</p>
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<p>1 ASHOT EGIАЗARYAN 2 THE VIDEOGRAPHER: Here begins 3 volume 2, videotape number 5 in the 4 deposition of Ashot Egiazaryan. 5 Today's date is Thursday, January 6 19th, 2012. The time on the video 7 monitor is 10:05 a.m. All who were 8 present at the January 18th 9 deposition are present today. 10 You may begin. 11 MR. GOLDEN: Jon, is what Ryan 12 said accurate with regard to who's 13 watching remotely? 14 MR. LUPKIN: Is what -- yes. 15 The only, I don't know if he's on 16 now, but the only person who would 17 be on, and I haven't seen his name 18 pop up yet, would be Mr. Holiner. 19 MR. GOLDEN: Thank you. 20 MR. LUPKIN: I didn't ask you 21 yesterday, but I take it with 22 respect to your team, nobody's on, 23 other than who's in the room? 24 MR. GOLDEN: Correct. 25 VALERII M. SCHUKIN,</p>	<p>1 ASHOT EGIАЗARYAN 2 (At this time, the requested 3 material was read to the witness.) 4 CONTINUED EXAMINATION 5 BY MR. GOLDEN: 6 Q. Mr. Egiazaryan, did you send 7 this email to Peter Zalmayev? 8 MR. LUPKIN: First of all, 9 let's give him an opportunity -- 10 have you had an opportunity to look 11 at it? 12 THE WITNESS: Is it in 13 English? 14 MR. LUPKIN: It is in English. 15 But you should look. 16 THE WITNESS: Why should I 17 look if I don't understand. 18 MR. LUPKIN: Can you please 19 read to him the email addresses 20 that appear on the document. 21 (At this time, the requested 22 material was read to the witness.) 23 THE WITNESS: Yes. 24 MR. LUPKIN: Okay, please, go 25 ahead.</p>

2 (Pages 232 to 235)

<p style="text-align: right;">Page 236</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 THE WITNESS: Shall I look</p> <p>3 further in the next pages what this</p> <p>4 thing is about?</p> <p>5 MR. LUPKIN: Look at whatever</p> <p>6 you think is necessary.</p> <p>7 Q. Please look at the first page.</p> <p>8 Did you send this email to Mr. Zalmayev?</p> <p>9 A. Honestly, I'm seeing this</p> <p>10 email address for the first time in my</p> <p>11 life, including this email address in the</p> <p>12 English language from whom it was sent.</p> <p>13 Q. Did you send it to --</p> <p>14 A. By that I mean --</p> <p>15 THE INTERPRETER: That's it.</p> <p>16 He said by that I mean and --</p> <p>17 MR. LUPKIN: Have you</p> <p>18 completed your answer?</p> <p>19 THE WITNESS: Not, I have not</p> <p>20 completed it.</p> <p>21 A. What I mean by that, this is</p> <p>22 not my address of the sender. Also, the</p> <p>23 address of the recipient, namely both of</p> <p>24 them. The other address, Zalmayev Euro</p> <p>25 Asia, as you said it, I see that for the</p>	<p style="text-align: right;">Page 238</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Are you saying that this is an</p> <p>3 email address that you have never used?</p> <p>4 A. Yes.</p> <p>5 Q. Did you ask somebody to send</p> <p>6 an email to Mr. Zalmayev on your behalf</p> <p>7 around the time of this email?</p> <p>8 A. My answer is no.</p> <p>9 Q. Please look at the second page</p> <p>10 of this exhibit.</p> <p>11 MR. GOLDEN: Mr. Translator,</p> <p>12 please read this to the witness.</p> <p>13 (At this time, the requested</p> <p>14 material was read to the witness.)</p> <p>15 A. May I ask you, may I ask you</p> <p>16 the question as of the interpreter.</p> <p>17 THE INTERPRETER: The</p> <p>18 interpreter's remark, addressing to</p> <p>19 the interpreter.</p> <p>20 MR. GOLDEN: I'm sorry, I</p> <p>21 don't understand.</p> <p>22 A. I have a question regarding</p> <p>23 the translation. May I ask this question</p> <p>24 of the interpreter?</p> <p>25 MR. GOLDEN: Oh, yes.</p>
<p style="text-align: right;">Page 237</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 first time, both of them for the first</p> <p>3 time. Of course I don't know the</p> <p>4 contents. Well perhaps you're going to</p> <p>5 mention it now. But probably it's the</p> <p>6 same source, it's the same source, just</p> <p>7 like the other letters that were shown</p> <p>8 yesterday, just another, just another</p> <p>9 fake. Did you get but just another fake?</p> <p>10 And but I'm going to answer your</p> <p>11 question.</p> <p>12 Q. The question was did you send</p> <p>13 the email to Mr. Zalmayev? And if you</p> <p>14 could, just say yes or no.</p> <p>15 MR. LUPKIN: Objection; asked</p> <p>16 and answered. You may answer</p> <p>17 again.</p> <p>18 A. My response is no.</p> <p>19 Q. Did you say before that the</p> <p>20 email address with your name in it on</p> <p>21 this piece of paper is an email address</p> <p>22 that you have never used?</p> <p>23 A. I said, and I repeat again,</p> <p>24 what I'm seeing here, that's the first</p> <p>25 time.</p>	<p style="text-align: right;">Page 239</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 THE INTERPRETER: He's asking</p> <p>3 me about the grammar in this. Do</p> <p>4 you allow me to explain it to him?</p> <p>5 MR. GOLDEN: Sure.</p> <p>6 THE INTERPRETER: My response</p> <p>7 was, he asked me if this was him,</p> <p>8 if he was addressing Peter. I said</p> <p>9 there is no signature here, there's</p> <p>10 not your name, but the email says</p> <p>11 from Ashot Egiazaryan which can be</p> <p>12 assumed that he's addressing,</p> <p>13 because it says a raw segment from</p> <p>14 my interview. And I said I cannot</p> <p>15 answer this question with certainty</p> <p>16 because there is no, it's not</p> <p>17 signed. From my interview, my</p> <p>18 interview.</p> <p>19 Just explain my interview with</p> <p>20 Dmitri Muratov. So if he's</p> <p>21 writing, my interview, his</p> <p>22 interview.</p> <p>23 Q. Mr. Egiazaryan, did you send</p> <p>24 this email to Peter Zalmayev?</p> <p>25 MR. LUPKIN: Objection; asked</p>

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<p>1 ASHOT EGIАЗARYAN</p> <p>2 and answered. But you may answer</p> <p>3 it again.</p> <p>4 A. I already responded to this</p> <p>5 question, but let me answer once again</p> <p>6 since you are asking, I'm grateful to you</p> <p>7 for your question.</p> <p>8 Q. Please --</p> <p>9 A. I did not send.</p> <p>10 Q. Did you ask somebody to send</p> <p>11 this on your behalf?</p> <p>12 A. I did not ask anybody to send</p> <p>13 it on my behalf.</p> <p>14 Q. Look at the third page,</p> <p>15 please.</p> <p>16 A. On my part, I would like to</p> <p>17 add not only did I ever gave interview to</p> <p>18 Dmitry Muratov, I've never met him in my</p> <p>19 life and I've never spoken the him on the</p> <p>20 telephone.</p> <p>21 Q. Please look at the third page.</p> <p>22 A. Let's do it.</p> <p>23 MR. GOLDEN: Please read, if</p> <p>24 you would, explain that the bottom</p> <p>25 half of this email is the previous</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 activities.</p> <p>3 Q. Did BGR create a website for</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. Did BGR prepare the content of</p> <p>7 your website?</p> <p>8 MR. LUPKIN: Objection to</p> <p>9 form. You may answer.</p> <p>10 A. Yes.</p> <p>11 MR. GOLDEN: Would you mark</p> <p>12 this next, please.</p> <p>13 (Exhibit 145 for</p> <p>14 identification, Bates stamped PZ</p> <p>15 003738 through 3783.)</p> <p>16 Q. Mr. Egiazaryan, did Mr.</p> <p>17 Gloriozov manage a bank account for you</p> <p>18 at Banque SCS Alliance SA?</p> <p>19 A. The point is that I did not</p> <p>20 have an account at the Banque SCS</p> <p>21 Alliance.</p> <p>22 Q. Did Mr. Gloriozov have an</p> <p>23 account there that he operated on your</p> <p>24 behalf?</p> <p>25 A. I wouldn't like to be specific</p>
Page 241	Page 243
<p>1 ASHOT EGIАЗARYAN</p> <p>2 email and the top half is new and</p> <p>3 read the top to him.</p> <p>4 (At this time, the requested</p> <p>5 material was read to the witness.)</p> <p>6 A. Please translate everything on</p> <p>7 this page so that I can understand. In</p> <p>8 view of the fake, they're talking about</p> <p>9 crude, fake, falsification, maybe some</p> <p>10 provocation, that's why I would like to</p> <p>11 understand everything before I respond.</p> <p>12 Please don't hurry up. Please once again</p> <p>13 from the top.</p> <p>14 THE INTERPRETER: I'm doing it</p> <p>15 from top.</p> <p>16 Q. Did you receive this email?</p> <p>17 A. In my previous response I said</p> <p>18 that I had never had any contacts with</p> <p>19 Dmitri Muratov, and also I have never</p> <p>20 sent any emails to Peter Zalmayev.</p> <p>21 Q. Did you retain BGR to manage</p> <p>22 your online activities?</p> <p>23 A. Yes.</p> <p>24 Q. Did BGR?</p> <p>25 A. Including the internet</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 here. Are you talking about, are you</p> <p>3 talking about his personal account, are</p> <p>4 you talking about the accounts of the</p> <p>5 companies that he managed on my behalf?</p> <p>6 If you mean the latter, Gloriozov had</p> <p>7 firms that he managed.</p> <p>8 Q. Did Mr. Gloriozov --</p> <p>9 MR. LUPKIN: Had you finished</p> <p>10 your answer?</p> <p>11 THE WITNESS: No.</p> <p>12 A. Then definitely there were</p> <p>13 accounts at the banks that he managed for</p> <p>14 the firms.</p> <p>15 Q. Do you recognize the</p> <p>16 signatures on the page that we're looking</p> <p>17 at?</p> <p>18 A. The signature on the first</p> <p>19 page could be, looks like, might be the</p> <p>20 signature of my brother Suren -- no, no,</p> <p>21 Artem. Or Suren. I would rather say</p> <p>22 Artem.</p> <p>23 Q. Do you recognize the other</p> <p>24 signature?</p> <p>25 A. No.</p>

4 (Pages 240 to 243)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Look at page 3746.</p> <p>3 MR. LUPKIN: I want him to use</p> <p>4 the original exhibit.</p> <p>5 Q. Do you recognize the</p> <p>6 signatures on that page?</p> <p>7 A. The first signature looks</p> <p>8 like, I would say rather like the</p> <p>9 signature of my brother Artem.</p> <p>10 Q. Do you recognize the --</p> <p>11 A. Or Suren. They are similar.</p> <p>12 I confuse their signatures.</p> <p>13 Q. Do you recognize the other</p> <p>14 signature?</p> <p>15 A. The second signature looks</p> <p>16 like comparing the documents that we</p> <p>17 studied yesterday which I saw about three</p> <p>18 days ago prior to our interview. Looks</p> <p>19 like the signature of Gloriovov.</p> <p>20 Q. Please turn to page 3758. Do</p> <p>21 you see the name Mogford Impex</p> <p>22 Corporation?</p> <p>23 A. Yes, I can see it.</p> <p>24 Q. Isn't that one of the</p> <p>25 companies, one of your companies that Mr.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. GOLDEN: I'm going to</p> <p>3 explain to you. Do you see the</p> <p>4 number?</p> <p>5 MR. LUPKIN: Yes.</p> <p>6 MR. GOLDEN: Now if you look</p> <p>7 at 3745 that I just showed the</p> <p>8 witness.</p> <p>9 MR. LUPKIN: Okay.</p> <p>10 MR. GOLDEN: You can see at</p> <p>11 the top of that page it has the</p> <p>12 bank, Compagnie Bancaire</p> <p>13 Helvétique, it says Mogford Impex</p> <p>14 Corporation and the account number</p> <p>15 is the same, 00793686.</p> <p>16 MR. LUPKIN: Yes, that's not</p> <p>17 -- but then it says .0002 on the</p> <p>18 document we're talking about now</p> <p>19 and here it says .001.</p> <p>20 MR. GOLDEN: That was a</p> <p>21 designation that the bank made for</p> <p>22 some purpose that is not</p> <p>23 immediately clear to me, but it</p> <p>24 seems to be the same account. If</p> <p>25 he wants to deny it, he can deny</p>
Page 245	Page 247
<p>1 ASHOT EGIAZARYAN</p> <p>2 Gloriovov operated for you?</p> <p>3 A. We are getting back to the</p> <p>4 same question that I responded to</p> <p>5 yesterday. Allow me to remind you. This</p> <p>6 company in my opinion belongs to and is</p> <p>7 operated to Artem and belongs, in my</p> <p>8 opinion, to Artem. I find it difficult</p> <p>9 to say, I don't remember whether</p> <p>10 Gloriovov managed that company. I never</p> <p>11 instructed him to do so. If he is</p> <p>12 related in some way to it, I am afraid of</p> <p>13 guessing.</p> <p>14 Q. Please look at page 3739.</p> <p>15 MR. GOLDEN: Mr. Translator,</p> <p>16 would you please read the last</p> <p>17 entry on this account page, the one</p> <p>18 that is dated 22/7/09.</p> <p>19 MR. LUPKIN: May I ask what</p> <p>20 account this is from?</p> <p>21 MR. GOLDEN: Yes. If you look</p> <p>22 up at the top of this page, you see</p> <p>23 there's an account number and it</p> <p>24 says 0079386.</p> <p>25 MR. LUPKIN: But what bank?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 it, but I'm going to ask him</p> <p>3 questions.</p> <p>4 MR. LUPKIN: Please continue.</p> <p>5 Note my objection.</p> <p>6 MR. GOLDEN: Mr. Translator,</p> <p>7 please read that line to the</p> <p>8 witness.</p> <p>9 THE INTERPRETER: For me to</p> <p>10 understand, the very last line?</p> <p>11 MR. GOLDEN: The last line,</p> <p>12 yes.</p> <p>13 THE INTERPRETER: This</p> <p>14 22/07/09?</p> <p>15 MR. GOLDEN: Yes.</p> <p>16 (At this time, the requested</p> <p>17 material was read to the witness.)</p> <p>18 Q. Mr. Egiazaryan --</p> <p>19 A. Is this the return of the</p> <p>20 money from company White & Case LLP?</p> <p>21 MR. LUPKIN: Objection; lacks</p> <p>22 foundation. You may answer.</p> <p>23 A. But what is the question?</p> <p>24 MR. GOLDEN: Mr. Translator, I</p> <p>25 didn't ask a question. I just</p>

5 (Pages 244 to 247)

Page 248	Page 250
<p>1 ASHOT EGIAZARYAN 2 asked you to read it to him. 3 THE INTERPRETER: I read it. 4 MR. GOLDEN: And then there 5 was an objection to a -- 6 THE INTERPRETER: Again, he's 7 asking me to read it again to him 8 in Russian. 9 MR. GOLDEN: But there's no 10 question. I asked you to read it 11 and I think that Mr. Lupkin 12 unintentionally confused the 13 witness by objecting even though 14 there wasn't a question. 15 Q. Do you know of a law firm 16 named White & Case? 17 A. Yes. It is a large American 18 law firm. 19 Q. Does that law firm, has that 20 law firm done legal work for you? 21 A. Yes. 22 Q. In July of 2009, did White & 23 Case make a deposit on your behalf into 24 this account of \$36,000 -- \$36 million? 25 A. Maybe, maybe the translation</p>	<p>1 ASHOT EGIAZARYAN 2 about the sales of a jet aircraft, that 3 White & Case was conducting that 4 transaction. 5 MR. VESLER: Hold it. White & 6 Case provided legal support for 7 this sale/purchase transaction. 8 It's not jet aircraft, it was just 9 aircraft sale. 10 THE INTERPRETER: If this is 11 an aircraft, but he didn't say 12 provided legal support. He said -- 13 (Interpreters confer.) 14 THE INTERPRETER: He didn't 15 say legal, he didn't use the word 16 legal. 17 A. That White & Case, I don't 18 know, supported. 19 MR. GOLDEN: If I might, the 20 distinction you're making I don't 21 think matters to the question. 22 MR. VESLER: Okay, fine. 23 A. May I complete my response? 24 MR. LUPKIN: Certainly, but 25 don't speculate.</p>
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<p>1 ASHOT EGIAZARYAN 2 is not quite correct. You mean this firm 3 deposited the money to me? 4 Q. Did this firm make a \$36 5 million deposit for you to this account? 6 MR. LUPKIN: Objection to 7 form. You may answer. 8 A. The way I understood it the 9 question was, and let me respond to this 10 question to be correct. Now I'm just 11 repeating your question, that the firm 12 White & Case made a deposit of \$36 13 million to me, gave this money to me, 14 that is your question? 15 Q. No, the question is -- 16 A. The firm White & Case never 17 gave me \$36 million and did not make a 18 deposit for my benefit. 19 Q. Do you remember a transaction 20 around the time of July 2009 that 21 generated about \$36 million for you? 22 A. In July of 2009? 23 Q. Yes. 24 A. Well, if I understand 25 correctly, maybe they're talking here</p>	<p>1 ASHOT EGIAZARYAN 2 A. Well, the only transaction 3 that White & Case was involved in was the 4 sales by Artem of an aircraft called 5 Gulfstream, Gulfstream 550. I was not 6 told about the details, the particulars 7 of the transaction. That's why I was not 8 privy to the details of this transaction. 9 That's why I cannot say if this was this 10 transaction or not. I was not engaged in 11 the nuances and the technicalities of 12 this transaction. 13 Q. In 2009, did Mogford own an 14 airplane? 15 A. In 2009 I think yes. 16 Q. Did you ever use it? 17 A. Yes, I have used it a few 18 times. 19 Q. And do you remember that that 20 plane was sold? 21 THE INTERPRETER: When? 22 Q. Do you remember that it was 23 sold? 24 A. Yes, naturally, I know about 25 it.</p>

6 (Pages 248 to 251)

Page 252	Page 254
<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Did White & Case do the legal</p> <p>3 work for the sale of that airplane?</p> <p>4 MR. LUPKIN: Objection; asked</p> <p>5 and answered. You may answer</p> <p>6 again.</p> <p>7 A. I've already responded. I</p> <p>8 will answer once again.</p> <p>9 Q. Is the answer yes?</p> <p>10 A. Well, the answer is just the</p> <p>11 way I can formulate that.</p> <p>12 Q. Did White & Case handle the</p> <p>13 sale of the airplane?</p> <p>14 A. I did not handle the technical</p> <p>15 transaction or the conversations with</p> <p>16 White & Case about the sales of the</p> <p>17 aircraft, of the airplane.</p> <p>18 Q. Who made the decision to</p> <p>19 sell --</p> <p>20 A. I know that the owner of the</p> <p>21 company Mogford, my brother, Artem,</p> <p>22 handled that. That is why all the</p> <p>23 negotiations with White & Case were</p> <p>24 conducted by him. I did not communicate</p> <p>25 with White & Case about the</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A. I've heard -- I've heard about</p> <p>3 this company during my conversations with</p> <p>4 my brother Artem or Suren. I think it</p> <p>5 was Artem.</p> <p>6 Q. What does Lulie International</p> <p>7 do?</p> <p>8 A. I don't know.</p> <p>9 Q. Turn to page --</p> <p>10 A. I could only guess.</p> <p>11 Q. Turn to page 3740.</p> <p>12 MR. GOLDEN: Mr. Translator,</p> <p>13 would you please read to him the</p> <p>14 second entry on the account sheet.</p> <p>15 (At this time, the requested</p> <p>16 material was read to the witness.)</p> <p>17 THE INTERPRETER: May I,</p> <p>18 interpreter's remark, may I ask you</p> <p>19 a question? Payment is abbreviated</p> <p>20 for payment, right, the second</p> <p>21 line?</p> <p>22 MR. GOLDEN: That's how I read</p> <p>23 the statement.</p> <p>24 THE INTERPRETER: Okay,</p> <p>25 payment. And then Ord meaning</p>
Page 253	Page 255
<p>1 ASHOT EGIAZARYAN</p> <p>2 technicalities of the sales of the</p> <p>3 airplane and that's why I'm not familiar</p> <p>4 with them.</p> <p>5 Q. Do you know of a company --</p> <p>6 MR. LUPKIN: He's not finished</p> <p>7 with his answer.</p> <p>8 MR. GOLDEN: He's long</p> <p>9 finished.</p> <p>10 MR. LUPKIN: No, he's not.</p> <p>11 A. That's why I cannot guess</p> <p>12 about the negotiations with White & Case</p> <p>13 regarding the technicalities of this</p> <p>14 issue.</p> <p>15 Q. Did you have in 2009 an</p> <p>16 attorney/client relationship with White &</p> <p>17 Case?</p> <p>18 MR. LUPKIN: Objection; calls</p> <p>19 for a legal conclusion, but you may</p> <p>20 answer based on your understanding.</p> <p>21 A. Yes.</p> <p>22 Q. Do you know of a company named</p> <p>23 Lulie International?</p> <p>24 A. I've heard about this company.</p> <p>25 Q. What is that company?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 order?</p> <p>3 MR. GOLDEN: That's how I read</p> <p>4 it.</p> <p>5 THE INTERPRETER: What is</p> <p>6 favor, meaning in favor?</p> <p>7 MR. GOLDEN: That's how I read</p> <p>8 it.</p> <p>9 THE INTERPRETER: Thank you,</p> <p>10 it's for my --</p> <p>11 (At this time, the requested</p> <p>12 material was read to the witness.)</p> <p>13 Q. Is Lulie International an</p> <p>14 offshore company?</p> <p>15 MR. LUPKIN: Objection; lacks</p> <p>16 foundation. You may answer.</p> <p>17 A. I've already responded that I</p> <p>18 don't know the registration, the type of</p> <p>19 business of this company, of Lulie</p> <p>20 International. I did not own Lulie and I</p> <p>21 don't own it.</p> <p>22 Q. What is the -- do you know a</p> <p>23 company named Clear Voice?</p> <p>24 MR. LUPKIN: Objection; asked</p> <p>25 and answered, but you may answer</p>

7 (Pages 252 to 255)

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<p>1 ASHOT EGIАЗARYAN</p> <p>2 again.</p> <p>3 A. I've heard about that company.</p> <p>4 If we are talking about the same company.</p> <p>5 That my brother Suren has such a company.</p> <p>6 Q. Mr. Translator, please --</p> <p>7 A. My cousin.</p> <p>8 MR. GOLDEN: Mr. Translator,</p> <p>9 please read to the witness the two</p> <p>10 lines in the approximate middle of</p> <p>11 the page, both dated the 12th of</p> <p>12 October 2009.</p> <p>13 MR. LUPKIN: Excuse me, may I</p> <p>14 just interrupt here, Jim, for a</p> <p>15 second? I think you may have the</p> <p>16 dates wrong. I think they're using</p> <p>17 the European dates, in which case</p> <p>18 the month would be in the middle</p> <p>19 instead of the day. It says</p> <p>20 12/10/09. That means October 12th,</p> <p>21 2009.</p> <p>22 MR. GOLDEN: That's what I</p> <p>23 said, I said the 12th of October</p> <p>24 2009.</p> <p>25 MR. LUPKIN: Is that what you</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 read it.</p> <p>3 Q. Were you aware that on the</p> <p>4 18th of November 2009 Mogford Impex</p> <p>5 Corporation opened an account at the Hypo</p> <p>6 Investment Bank of Liechtenstein?</p> <p>7 A. They could have done it.</p> <p>8 Q. Please turn to page 3764.</p> <p>9 MR. GOLDEN: Mr. Translator,</p> <p>10 please read the portion of this</p> <p>11 that begins at the top where it</p> <p>12 says client and there's a number</p> <p>13 and through the line that says to</p> <p>14 Edward Lozansky.</p> <p>15 (At this time, the requested</p> <p>16 material was read to the witness.)</p> <p>17 Q. Mr. Egiazaryan, who is Edward</p> <p>18 Lozansky?</p> <p>19 A. Edward Lozansky is a citizen</p> <p>20 of the United States, a scientist. In</p> <p>21 his time he came to America, he was</p> <p>22 granted political asylum. His wife owns</p> <p>23 the magazine -- he and his wife own the</p> <p>24 magazine called Continent. He is the</p> <p>25 president of the so-called Russia House</p>
Page 257	Page 259
<p>1 ASHOT EGIАЗARYAN</p> <p>2 said? I apologize. Forgive me.</p> <p>3 (At this time, the requested</p> <p>4 material was read to the witness.)</p> <p>5 A. Okay.</p> <p>6 Q. Do you know why Lulie</p> <p>7 transferred \$5 million to this Mogford</p> <p>8 account on the 12th of October 2009?</p> <p>9 A. Let me say once again. I'm</p> <p>10 not handling either Lulie, the Lulie</p> <p>11 company or Mogford company. The</p> <p>12 companies Lulie and Mogford do not belong</p> <p>13 to me. I'm not handling their financial</p> <p>14 operations and do not know about them.</p> <p>15 That is why I cannot comment on these</p> <p>16 companies' operations.</p> <p>17 Q. Please look at page 3759.</p> <p>18 MR. GOLDEN: Mr. Translator,</p> <p>19 please read the portion of this</p> <p>20 page between the line "Opening of</p> <p>21 bank account" and the number</p> <p>22 information about four lines down.</p> <p>23 (At this time, the requested</p> <p>24 material was read to the witness.)</p> <p>25 THE INTERPRETER: Okay, I've</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 in Washington.</p> <p>3 His wife was the daughter of a</p> <p>4 general who brought the Russian, the</p> <p>5 Soviet troops into Czechoslovakia when</p> <p>6 they crushed the Czechoslovakian revolt</p> <p>7 there.</p> <p>8 Q. Are you referring to 1967?</p> <p>9 A. Absolutely correct.</p> <p>10 Q. When did Mr. Lozansky get</p> <p>11 political asylum?</p> <p>12 A. I don't know in what year he</p> <p>13 got it.</p> <p>14 Q. Was it in the last ten years,</p> <p>15 or before that?</p> <p>16 A. I know that it was still when</p> <p>17 there was the Soviet Union.</p> <p>18 Q. When did you first meet him?</p> <p>19 A. I met him approximately in the</p> <p>20 year 1990.</p> <p>21 Q. What were the circumstances</p> <p>22 when you met him?</p> <p>23 A. Oh maybe it was in 1991. The</p> <p>24 circumstances, when he was engaged in the</p> <p>25 student exchange with I think Moscow</p>

8 (Pages 256 to 259)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 State University. We were involved in</p> <p>3 the academic environment at that time.</p> <p>4 He had contacts with and was a friend of</p> <p>5 Gavril Popov, G-a-v-r-i-l P-o-p-o-v.</p> <p>6 That is a famous scientist. Right now</p> <p>7 he's the president of the International</p> <p>8 University in Moscow. He was my</p> <p>9 scientific dean of my work. And it was</p> <p>10 during one of the meetings that I met</p> <p>11 him.</p> <p>12 Q. Do you know why Mogford paid</p> <p>13 him \$200,000?</p> <p>14 MR. LUPKIN: Please don't</p> <p>15 speculate.</p> <p>16 A. My response is that quite</p> <p>17 probable I had asked Artem to pay this</p> <p>18 money to Lozansky.</p> <p>19 Q. Why did you ask Artem -- why</p> <p>20 did you ask Artem to pay the money?</p> <p>21 A. Because I didn't have my own</p> <p>22 money, that's why I could ask Artem or</p> <p>23 Suren to borrow money and pay Lozansky.</p> <p>24 Q. But why did you want to pay</p> <p>25 Lozansky?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 may answer.</p> <p>3 A. I don't remember whether it</p> <p>4 was Mogford who paid, but whether,</p> <p>5 whatever, wherever this payment came</p> <p>6 from, that was done at my request.</p> <p>7 Q. Why did you request that</p> <p>8 payment?</p> <p>9 A. I had many contacts with the</p> <p>10 international chess organization. I</p> <p>11 think that chess is the very game that</p> <p>12 helps develop people. When I still was</p> <p>13 in Russia I helped the program called</p> <p>14 Chess in Schools. I think this is a</p> <p>15 correct and very useful development of</p> <p>16 children to use chess.</p> <p>17 Q. Is a -- I'm sorry.</p> <p>18 MR. LUPKIN: I think there's a</p> <p>19 translation coming.</p> <p>20 THE INTERPRETER: Just a</p> <p>21 minute.</p> <p>22 A. I think this is a very, my</p> <p>23 activity's very charitable and very</p> <p>24 useful activity and I enjoyed the support</p> <p>25 of the president of the chess</p>
Page 261	Page 263
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Probably I owed him money for</p> <p>3 some of his services. I owed money to</p> <p>4 him and I had to repay that.</p> <p>5 Q. Why --</p> <p>6 A. And I did repay him.</p> <p>7 Q. What services did he perform</p> <p>8 for you?</p> <p>9 A. I don't remember now. It was</p> <p>10 about three years ago. I have to look up</p> <p>11 the documents, the archives.</p> <p>12 Q. And where are the documents?</p> <p>13 A. I have them in my archives in</p> <p>14 Moscow, in my office.</p> <p>15 Q. Turn to page 3765. Do you</p> <p>16 know the company Mitra Holding?</p> <p>17 A. I recognize the name.</p> <p>18 Q. What is Mitra Holding?</p> <p>19 A. I don't remember. It's not my</p> <p>20 company. This is exact.</p> <p>21 Q. Do you know why Mogford Impex</p> <p>22 made a payment in 2010 to the World Chess</p> <p>23 Foundation?</p> <p>24 MR. LUPKIN: Objection; lacks</p> <p>25 foundation. You may answer. You</p>	<p>1 ASHOT EGIAZARYAN Kirsan Ilyumzhinov</p> <p>2 association, Mr. Kersan Lumjinov, K-e-r-a</p> <p>3 -- I'm sorry, K-e-r-s-a-n, and last name</p> <p>4 is L-u-m-j-i-n-o-v. I think it's very</p> <p>5 important, that's why I rendered my</p> <p>6 assistance.</p> <p>7 Q. Is the law firm Aviaras and</p> <p>8 Philippou representing you in Cyprus?</p> <p>9 A. Yes, perhaps. The name in</p> <p>10 English sounds slightly different, but</p> <p>11 perhaps, yes.</p> <p>12 Q. Are they representing you in</p> <p>13 your lawsuit against Mr. Kerimov and Mr.</p> <p>14 Kerimov's companies?</p> <p>15 A. Yes.</p> <p>16 Q. Please turn to page 3768.</p> <p>17 MR. GOLDEN: Mr. Translator,</p> <p>18 please read the portion of this</p> <p>19 from the top where it says client</p> <p>20 through the line that says to</p> <p>21 Aviaras and Philippou.</p> <p>22 (At this time, the requested</p> <p>23 material was read to the witness.)</p> <p>24 A. What company, can you say</p> <p>25 again?</p>

9 (Pages 260 to 263)

ASHOT EGIAZARYAN - 1/19/2012

<p style="text-align: right;">Page 264</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 THE INTERPRETER: The witness</p> <p>3 asked me to read to him from whom</p> <p>4 that transfer was. May I read it?</p> <p>5 MR. GOLDEN: Yes. What are</p> <p>6 you going to read, what part of it?</p> <p>7 THE INTERPRETER: You tell me.</p> <p>8 MR. GOLDEN: Oh, okay, fine.</p> <p>9 Show to him the client number at</p> <p>10 the upper left-hand corner, 318240.</p> <p>11 (At this time, the requested</p> <p>12 material was read to the witness.)</p> <p>13 Q. Did you request that 550,000</p> <p>14 Euros be paid to Aviaras and Philippou.</p> <p>15 A. Yes, I think so. Such payments were</p> <p>16 Q. Why did you make the payment</p> <p>17 from the Mogford Impex account?</p> <p>18 A. Well, probably because at that</p> <p>19 time I had asked my cousin to do that as</p> <p>20 a loan to me.</p> <p>21 Q. Is a law firm named Greenberg</p> <p>22 Traurig doing legal work for you?</p> <p>23 A. You mean Traurig? requested and approved by</p> <p>24 Q. Yes. all of the parties that</p> <p>25 A. Yes. retained Aviaras and</p> <p style="text-align: right;">Phillippou.</p>	<p style="text-align: right;">Page 266</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 But I don't remember, but if you ask me</p> <p>3 what the date and which account and which</p> <p>4 payment, I can tell you, but I don't</p> <p>5 remember the specific dates and</p> <p>6 statements.</p> <p>7 Q. In 2010 how many different</p> <p>8 accounts did you use to pay lawyers who</p> <p>9 were working for you?</p> <p>10 A. I said, I've already answered</p> <p>11 before that the question that I don't</p> <p>12 remember the accounts. I'm paying them,</p> <p>13 but when and which account and on what</p> <p>14 day I don't remember.</p> <p>15 Q. That wasn't the question. The</p> <p>16 question is in 2010 approximately how</p> <p>17 many different accounts do you use to pay</p> <p>18 your lawyers?</p> <p>19 A. None of my own.</p> <p>20 Q. Whose accounts do you use to</p> <p>21 pay your lawyers?</p> <p>22 A. When I need the money I ask</p> <p>23 either Suren or Artem and I have an</p> <p>24 agreement with them that when I need</p> <p>25 money they furnish it to me. And they</p>
<p style="text-align: right;">Page 265</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Please turn to page 3773. Did</p> <p>3 you request that a payment from Mogford</p> <p>4 Impex be made to Greenberg Traurig in the</p> <p>5 amount of \$100,000?</p> <p>6 A. I worked with --</p> <p>7 MR. LUPKIN: Just one second.</p> <p>8 If what the answer is going to be</p> <p>9 relates to what it is that</p> <p>10 Greenberg Traurig did for them, I'm</p> <p>11 going to ask that Mr. Muranov leave</p> <p>12 the room.</p> <p>13 MR. GOLDEN: That wasn't my</p> <p>14 question.</p> <p>15 MR. LUPKIN: Well, I don't</p> <p>16 know what the answer is going to</p> <p>17 be, so I just want to --</p> <p>18 A. Shall I answer?</p> <p>19 Q. Yes.</p> <p>20 A. Quite probable that I've paid</p> <p>21 the accounts. I don't remember which</p> <p>22 accounts, but I work, I work with the</p> <p>23 firm Greenberg and I'm paying their</p> <p>24 bills, but I just don't remember the</p> <p>25 dates or which accounts I can answer.</p>	<p style="text-align: right;">Page 267</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 make payments as a loan to me.</p> <p>3 Q. And do they make payments --</p> <p>4 A. Myself, I don't own any</p> <p>5 account except the account in Moscow.</p> <p>6 Q. When you say the account in</p> <p>7 Moscow, what do you mean?</p> <p>8 MR. LUPKIN: Before you answer</p> <p>9 that question, it is not covered</p> <p>10 within the ambit of what is</p> <p>11 presumptively attorneys' eyes only,</p> <p>12 but given the nature of what I</p> <p>13 perceive Mr. Muranov's role is</p> <p>14 here, I think that asking questions</p> <p>15 about the Moscow account, including</p> <p>16 whatever details you're going to</p> <p>17 ask about, I'd like to have done on</p> <p>18 a attorneys' eyes only basis.</p> <p>19 MR. GOLDEN: Actually, I don't</p> <p>20 want any details, all I'm going to</p> <p>21 ask him is to tell me whether it's</p> <p>22 a personal account or a business</p> <p>23 account and if it's a business,</p> <p>24 what's the name of the business.</p> <p>25 That's all I'm going to ask him.</p>

10 (Pages 264 to 267)

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1 ASHOT EGIAZARYAN
 2 MR. LUPKIN: Okay, let's see
 3 what he says.
 4 MR. GOLDEN: What was my
 5 question?
 6 (Record read as requested.)
 7 A. I meant an account in Moscow.
 8 **Q. Is it a personal account or a**
 9 **business account?**
 10 A. Personal account.
 11 **Q. Please turn to page 3774.**
 12 MR. GOLDEN: Mr. Translator,
 13 please read that to the witness.
 14 (At this time, the requested
 15 material was read to the witness.)
 16 **Q. Do you know the name of a**
 17 **company Red Giant?**
 18 A. The point is that I saw this
 19 -- I saw this paper quite recently, a few
 20 days ago when I was preparing for the
 21 deposition.
 22 **Q. Do you know the name of a**
 23 **company named Red Giant?**
 24 A. Yes.
 25 **Q. What is it?**

1 ASHOT EGIAZARYAN
 2 A. I understand this company
 3 belongs to, after I said this, I
 4 understand that this company is owned by
 5 Gloriozov.
 6 **Q. Is it owned by Gloriozov on**
 7 **behalf of somebody else?**
 8 A. I don't think he owns this
 9 company on my behalf. I have not given
 10 any instructions, any orders to -- I've
 11 never asked him to create this company on
 12 my behalf and he never told me that he
 13 was creating this company on my behalf.
 14 **Q. Do you know why Mogford paid**
 15 **\$5 million to Red Giant?**
 16 MR. LUPKIN: Objection; lacks
 17 foundation. You may answer.
 18 A. No.
 19 **Q. Is Drew Holiner a lawyer who's**
 20 **representing you in the United Kingdom?**
 21 THE INTERPRETER: I'm sorry, I
 22 failed to understand the name.
 23 **Q. Drew Holiner.**
 24 A. Maybe you meant Holiner.
 25 **Q. Yes, that's what I meant.**

1 ASHOT EGIAZARYAN
 2 A. Yes.
 3 **Q. Did you request that Mogford**
 4 **pay him \$2.2 million at any time in 2011?**
 5 A. I did not ask Mogford to make
 6 payment, I had asked Artem so that he
 7 would organize payment to him.
 8 **Q. Was that for legal work that**
 9 **Mr. Holiner was doing for you?**
 10 A. Quite correct.
 11 **Q. Did you request that Mogford**
 12 **pay \$2 million --**
 13 A. And also the services that he
 14 is probably doing for Artem because I
 15 cannot -- because I cannot talk about the
 16 exact amount, which portion of that
 17 amount goes to pay, to pay for my
 18 services to me.
 19 **Q. In approximately May of 2011,**
 20 **did you request that Mogford pay \$2**
 21 **million to Aviaras and Philippou?**
 22 A. From Aviaras.
 23 **Q. If you look at page 3776,**
 24 **that's where this transaction is shown.**
 25 A. As I have told you previously

1 ASHOT EGIAZARYAN
 2 about Holiner, the same thing about this
 3 Cypriot, that amount contains also
 4 payments for my bills because this law
 5 firm is handling both Artem and my issues
 6 and that amount could be, could contain
 7 my portions, you know, payments for my
 8 bills.
 9 MR. GOLDEN: Would you please
 10 read to him the portion of this
 11 document following reference in the
 12 lower right-hand, right side.
 13 (At this time, the requested
 14 material was read to the witness.)
 15 **Q. Did Mogford purchase offices**
 16 **in Cyprus?**
 17 A. As I've already said, that
 18 this company, Mogford, does not belong to
 19 me, and that company, the Mogford company
 20 may conduct purchases of offices,
 21 airplanes, conduct other business. As
 22 far as I'm concerned, I have no relations
 23 with the activities of this company.
 24 I have heard conversations
 25 that there were some development projects

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<p>1 ASHOT EGIAZARYAN</p> <p>2 in Cyprus. That Artem had studied those</p> <p>3 questions and since the market now is</p> <p>4 pretty much down so the prices to</p> <p>5 purchase real estate in Cyprus is quite</p> <p>6 favorable now.</p> <p>7 Q. In approximately May of 2011</p> <p>8 did you request that Mogford transfer \$2</p> <p>9 million to Suren?</p> <p>10 A. No.</p> <p>11 Q. Please turn to page 3745.</p> <p>12 MR. GOLDEN: Mr. Translator,</p> <p>13 would you read to the witness the</p> <p>14 line about two-thirds of the way</p> <p>15 down for the date 5th of May 2011</p> <p>16 that says transfer favor</p> <p>17 Egiazaryan.</p> <p>18 (At this time, the requested</p> <p>19 material was read to the witness.)</p> <p>20 A. What is the amount?</p> <p>21 Q. In May of 2011, did Mogford</p> <p>22 transfer \$900,000 to you?</p> <p>23 A. No.</p> <p>24 Q. In the United States, do you</p> <p>25 have a bank account in your name?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Either from Artem or Suren.</p> <p>3 Q. If you don't have a checking</p> <p>4 account in the United States, how do you</p> <p>5 pay personal bills?</p> <p>6 A. Very simple. I have an</p> <p>7 account in Moscow. I use that account.</p> <p>8 THE INTERPRETER: Can we get a</p> <p>9 short break?</p> <p>10 MR. GOLDEN: Yes, we can take</p> <p>11 a break.</p> <p>12 THE VIDEOGRAPHER: This will</p> <p>13 end tape 5, volume 2 of the</p> <p>14 deposition of Ashot Egiazaryan, the</p> <p>15 time is 11:31 a.m., we're off the</p> <p>16 record.</p> <p>17 (A recess was taken.)</p> <p>18 THE VIDEOGRAPHER: This is the</p> <p>19 start of tape number 6 in the</p> <p>20 deposition of Ashot Egiazaryan.</p> <p>21 The time is 11:46 a.m., we're on</p> <p>22 the record.</p> <p>23 MR. GOLDEN: Please mark this</p> <p>24 next.</p> <p>25 (Exhibit 146 for</p>
Page 273	Page 275
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. My response is no.</p> <p>3 Q. In the United States, is there</p> <p>4 an account in your wife's name?</p> <p>5 A. My wife has an account, but I</p> <p>6 can speak for her that this money has not</p> <p>7 been transferred to her.</p> <p>8 MR. GOLDEN: Please read to</p> <p>9 the witness the next line on the</p> <p>10 date of the 16th of June 2011 that</p> <p>11 begins "Payment order."</p> <p>12 (At this time, the requested</p> <p>13 material was read to the witness.)</p> <p>14 A. Yes, quite possible. It was</p> <p>15 payment that is made, was made to my wife</p> <p>16 at my -- at my request as a loan.</p> <p>17 Q. A loan to -- let me ask a</p> <p>18 different question.</p> <p>19 Is Natalia Tsagolova your</p> <p>20 wife?</p> <p>21 A. Yes, Tsagolova.</p> <p>22 Q. And you said before that this</p> <p>23 payment is a loan?</p> <p>24 A. Yes, I said so.</p> <p>25 Q. A loan from whom to whom?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 identification, Bates stamped</p> <p>3 EA-0000026 through 29 and 20 through</p> <p>4 25.)</p> <p>5 Q. Mr. Egiazaryan, please turn to</p> <p>6 the page numbered 0000020.</p> <p>7 MR. LUPKIN: There's no 20</p> <p>8 here.</p> <p>9 THE INTERPRETER: There is.</p> <p>10 MR. LUPKIN: There is at the</p> <p>11 back?</p> <p>12 THE INTERPRETER: In Russian.</p> <p>13 MR. GOLDEN: It's in</p> <p>14 approximately the middle.</p> <p>15 MR. LUPKIN: Before we begin</p> <p>16 the questioning, Jim, since this is</p> <p>17 on an issue pertaining to a pending</p> <p>18 criminal matter, I would ask that</p> <p>19 Mr. Muranov not be presented and</p> <p>20 this be treated as attorneys' eyes</p> <p>21 only.</p> <p>22 MR. GOLDEN: That's not within</p> <p>23 the scope of the judge's order.</p> <p>24 MR. LUPKIN: I understand</p> <p>25 that, I understand it's not within</p>

12 (Pages 272 to 275)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 the scope, but I'm saying under</p> <p>3 these circumstances, given the</p> <p>4 pendency of the case and what we</p> <p>5 believe Mr. Muranov's affiliations</p> <p>6 are, it's inappropriate for him to</p> <p>7 be sitting here during any</p> <p>8 discussion of this and I would ask</p> <p>9 that he not be here. So we have a</p> <p>10 couple of options. We can save it</p> <p>11 for the end, we can do it as</p> <p>12 attorneys' eyes only or we cannot</p> <p>13 do it.</p> <p>14 MR. GOLDEN: Give me a minute</p> <p>15 to consult with my colleagues.</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 11:48 a.m., we're off the record.</p> <p>18 (A recess was taken.)</p> <p>19 THE VIDEOGRAPHER: The time is</p> <p>20 11:57 a.m., we're back on the</p> <p>21 record.</p> <p>22 MR. GOLDEN: Did you make your</p> <p>23 request on the record?</p> <p>24 MR. LUPKIN: I think I made</p> <p>25 the request on the record, but I</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. LUPKIN: May I ask what</p> <p>3 subject it is?</p> <p>4 MR. GOLDEN: Well, let me show</p> <p>5 you the first document rather than</p> <p>6 me summarizing it.</p> <p>7 Would you mark this next.</p> <p>8 (Exhibit 149 for</p> <p>9 identification, article in Novaya</p> <p>10 Gazeta.)</p> <p>11 MR. LUPKIN: You can have him</p> <p>12 come back in.</p> <p>13 (At this time, Mr. Muranov</p> <p>14 returned to the deposition room.)</p> <p>15 Q. Mr. Egiazaryan, what is</p> <p>16 Exhibit 149?</p> <p>17 MR. LUPKIN: Would you like</p> <p>18 him to read it?</p> <p>19 MR. GOLDEN: First I'm asking</p> <p>20 him to tell me what it is.</p> <p>21 MR. LUPKIN: Well, I would</p> <p>22 imagine he would need to read it</p> <p>23 before he can tell you what it is,</p> <p>24 but at least familiarize yourself</p> <p>25 with the document, Mr. Egiazaryan,</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 can summarize what has been agreed</p> <p>3 to if it's okay.</p> <p>4 MR. GOLDEN: If it's on the</p> <p>5 record I'll just respond. We don't</p> <p>6 agree that the questioning about</p> <p>7 document 146 and related things are</p> <p>8 within the judge's attorneys eyes</p> <p>9 only order, but to have the</p> <p>10 deposition move more efficiently,</p> <p>11 we will agree that Mr. Muranov will</p> <p>12 leave the room, we will temporarily</p> <p>13 treat this material as attorneys's</p> <p>14 eyes only. After we have the</p> <p>15 transcript, we will ask you to lift</p> <p>16 it and if you don't, we'll go back</p> <p>17 to the judge just as we did on the</p> <p>18 LDPR issue.</p> <p>19 MR. LUPKIN: Very good.</p> <p>20 (At this time, Mr. Muranov</p> <p>21 left the deposition room.)</p> <p>22 (The following testimony</p> <p>23 contained was designated</p> <p>24 confidential, attorneys' eyes only</p> <p>25 and bound separately.)</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 before you answer Mr. Golden's</p> <p>3 question. You can answer Mr.</p> <p>4 Golden's question.</p> <p>5 Q. Is this an article, a press</p> <p>6 article of some kind?</p> <p>7 A. Yes, I would say rather yes.</p> <p>8 Because on top it says Novaya Gazeta,</p> <p>9 N-o-v-a-y-a.</p> <p>10 Q. And what is Novaya Gazeta?</p> <p>11 A. Novaya Gazeta is a periodic</p> <p>12 publication in Russia.</p> <p>13 Q. In 2003, was it published</p> <p>14 online or in paper form?</p> <p>15 A. I can only say that I saw it</p> <p>16 in their street newspaper stands or</p> <p>17 arriving there on plane. It was</p> <p>18 distributed there, yes, on paper.</p> <p>19 Q. Would you read the title of</p> <p>20 the article, please?</p> <p>21 A. That was on 01/12/2003, "OPG</p> <p>22 joined the Euro Union."</p> <p>23 Q. What is OPG?</p> <p>24 A. I don't know what they're</p> <p>25 talking about. I just read what you</p>

13 (Pages 276 to 294)

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2 asked me to do.

3 **Q. Read the section right below**
4 **the headline.**5 A. "The shots in the center of
6 Moscow, are they going to be echoed in
7 Okhotny Ryad?" O-k-h-o-t-n-y, Ryad,
8 R-y-a-d.9 **Q. Isn't there more than that?**10 A. "Last week, the information
11 agencies sent published information, a
12 report, which do not spoil reader that
13 often: A triple murder has been revealed
14 of the former employees of the MVD of
15 Armenia - David Margaryan."
16 M-a-r-g-a-r-y-a-n. Then row of dots.17 **Q. Does OCG stand for United**
18 **Criminal Group?**19 A. Well, I have to read the
20 article and then we're going to decipher
21 it.22 **Q. You don't recognize the phrase**
23 **OCG as United Criminal Group without**
24 **reading the article?**

25 A. It could be deciphered in any

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1 ASHOT EGIAZARYAN

2 way, it could also be deciphered as
3 United Industrial Group. That's why I
4 have to read it.5 **Q. Are you familiar with the**
6 **American English phrase organized crime?**7 A. I'm familiar with the
8 organized crime. It is the same in all
9 languages, you know, the essence when you
10 translate it.11 **Q. Is United Criminal Group an**
12 **organized crime group?**

13 A. Which one?

14 **Q. That was my question. Is the**
15 **group United Criminal Group, OCG, a group**
16 **of organized criminals?**17 MR. LUPKIN: Objection; asked
18 and answered. You may answer it.19 A. That's what I am saying. I
20 have to read the whole article and then
21 we would understand the context, the
22 context it is mentioned. Let me read the
23 article and then I can tell you what they
24 mean by that.25 **Q. Mr. Egiazaryan, I gave this**

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1 ASHOT EGIAZARYAN

2 **article to your lawyers I think on Monday**
3 **so they could show it to you before the**
4 **deposition today. Have you read this**
5 **article before today?**6 A. I did not see this article at
7 my lawyers'. That's why I'm saying I
8 have to read it. Well, I see judging by
9 the top line they're talking about 2003.
10 If you ask me about all the articles I
11 read in 2003, I cannot answer that
12 question. The point is at my work I have
13 to familiarize myself with quite a number
14 of articles published in that day in the
15 press. I am going to be happy to answer
16 your question after I read it.17 **Q. Please read the article to**
18 **yourself and each time you come to your**
19 **name tell us so we can count how many**
20 **times your name is mentioned in this**
21 **article.**

22 A. Okay.

23 MR. LUPKIN: Before any -- can
24 we take a two second break, please,
25 while he's reading the article?

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1 ASHOT EGIAZARYAN

2 MR. GOLDEN: Yes, but tell him
3 to keep reading. Jon, I want him
4 to call out every time he spots his
5 name, so I think you ought to be
6 here as he reads the article.7 MR. LUPKIN: Why doesn't he
8 underline it and we'll come back.9 MR. GOLDEN: Okay. Why don't
10 we go off the video.11 THE VIDEOGRAPHER: The time is
12 12:49 p.m., we're off the record.

13 (A recess was taken.)

14 (The following took place off
15 the video record.)16 THE WITNESS: You told me to
17 mention when I see my last name.18 MR. GOLDEN: His lawyers told
19 him just to underline them until
20 they came back.21 THE WITNESS: If they come
22 back. If they go to have lunch.23 THE VIDEOGRAPHER: The time is
24 12:54 p.m., we're back on the
25 record.

14 (Pages 295 to 298)

Page 299	Page 301
<p>1 ASHOT EGIАЗARYAN</p> <p>2 MR. LUPKIN: As I noted to Mr.</p> <p>3 Golden off the record, the document</p> <p>4 that we're talking about, Exhibit</p> <p>5 149, as we understand it, was not</p> <p>6 part of the package of documents</p> <p>7 that was provided to us in advance</p> <p>8 by Mr. Golden. I just wanted the</p> <p>9 record to be clear on that.</p> <p>10 Please continue.</p> <p>11 MR. GOLDEN: Since you</p> <p>12 mentioned it, I have to say I think</p> <p>13 I sent it to you, but perhaps we</p> <p>14 can confirm it if it matters.</p> <p>15 Q. Mr. Egiазaryan, did you read</p> <p>16 the article?</p> <p>17 A. Yes.</p> <p>18 Q. How many times is your name</p> <p>19 mentioned?</p> <p>20 MR. LUPKIN: I object to this</p> <p>21 procedure unless you have him read</p> <p>22 the context. But go ahead.</p> <p>23 A. Four.</p> <p>24 Q. Does the article mention a man</p> <p>25 named Tevos Safaryan?</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 keeping a straight face. I'd ask</p> <p>3 you to comport yourself in a</p> <p>4 professional manner as we're having</p> <p>5 a dialogue on the record. My issue</p> <p>6 --</p> <p>7 MR. GOLDEN: Wait a second,</p> <p>8 wait a second, if you're going to</p> <p>9 talk like that to me, I'm going to</p> <p>10 respond. That's the third time in</p> <p>11 a court proceeding you've asked me</p> <p>12 that question and every time you</p> <p>13 asked the question I'm going to</p> <p>14 smile, okay. I think you're</p> <p>15 pompous and when you're pompous you</p> <p>16 make me smile. That's why I smile.</p> <p>17 So if you acted differently I</p> <p>18 wouldn't smile. But sometimes I</p> <p>19 do.</p> <p>20 Now, if you want to have a</p> <p>21 discussion about this document, go</p> <p>22 ahead.</p> <p>23 MR. LUPKIN: You're entitled</p> <p>24 to your opinion, but be that as it</p> <p>25 may, the magistrate made a ruling</p>
Page 300	Page 302
<p>1 ASHOT EGIАЗARYAN</p> <p>2 A. Yes.</p> <p>3 Q. Does the article say that at</p> <p>4 some point Mr. Safaryan was the suspect</p> <p>5 in a murder case?</p> <p>6 MR. LUPKIN: May I inquire of</p> <p>7 counsel what the relevance of this</p> <p>8 document is to whether or not there</p> <p>9 was a defamation case that went on</p> <p>10 that accused my client of</p> <p>11 anti-Semitism?</p> <p>12 MR. GOLDEN: We've been</p> <p>13 through all this with Judge</p> <p>14 Gorenstein.</p> <p>15 MR. LUPKIN: Yes, we have.</p> <p>16 MR. GOLDEN: This is an</p> <p>17 article written about him in 2003</p> <p>18 that affects his reputation and so</p> <p>19 it's relevant.</p> <p>20 MR. LUPKIN: Well, no, I don't</p> <p>21 think that that's what the</p> <p>22 magistrate said. The magistrate</p> <p>23 said that there are lines to be</p> <p>24 drawn between reputation -- Jim,</p> <p>25 you obviously have a difficult time</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 under the Sharon case that certain</p> <p>3 things are relevant with regard to</p> <p>4 reputation and that there are</p> <p>5 certain things that are not. And</p> <p>6 unless you could explain to me why</p> <p>7 this is remotely relevant to his</p> <p>8 reputation on the subject matter</p> <p>9 that remains in the case, I'm not</p> <p>10 going to permit him to answer</p> <p>11 anymore questions about this.</p> <p>12 MR. GOLDEN: Well then are you</p> <p>13 directing him not to answer</p> <p>14 pursuant to a motion that you're</p> <p>15 going to make to terminate the</p> <p>16 deposition?</p> <p>17 MR. LUPKIN: The procedure</p> <p>18 that the magistrate talked about</p> <p>19 was directing the witness not to</p> <p>20 answer. The procedure said -- well</p> <p>21 first let me -- are you going to</p> <p>22 answer my question? Can you</p> <p>23 explain to me why this is relevant</p> <p>24 to that reputation?</p> <p>25 MR. GOLDEN: Not until you</p>

15 (Pages 299 to 302)

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<p style="text-align: right;">Page 303</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 tell me what you're planning to do.</p> <p>3 MR. LUPKIN: I'm not going to</p> <p>4 answer that question until you tell</p> <p>5 me what the relevance is.</p> <p>6 MR. GOLDEN: It was discussed</p> <p>7 at length before Judge Gorenstein</p> <p>8 and I'm not going to repeat myself.</p> <p>9 MR. LUPKIN: We'll take it</p> <p>10 question by question. Please</p> <p>11 proceed.</p> <p>12 MR. GOLDEN: Would you read</p> <p>13 back the last question, please.</p> <p>14 (Record read as requested.)</p> <p>15 A. Analyzing Gevorkyan's</p> <p>16 connections, G-e-v-o-r-k-y-a-n apostrophe</p> <p>17 s, in Sleuths and investigators of</p> <p>18 special services ran into another name,</p> <p>19 Tevos Safaryan.</p> <p>20 Q. The article mentions a bank</p> <p>21 named Mosnatsbank. What is that?</p> <p>22 A. I have already responded to</p> <p>23 this question before. I can repeat.</p> <p>24 This was the bank where I was the</p> <p>25 chairman of the board.</p>	<p style="text-align: right;">Page 305</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 a book, an address book, perhaps, by Mr.</p> <p>3 Safaryan?</p> <p>4 MR. LUPKIN: Objection to</p> <p>5 form. You can translate.</p> <p>6 A. Your statement is incorrect.</p> <p>7 Q. Read the sentence where your</p> <p>8 name appears for the first time.</p> <p>9 A. Just a minute. "Paging</p> <p>10 through this address book, the agents</p> <p>11 could run into a mass of interesting</p> <p>12 names, including the name of Ashot</p> <p>13 Egiazaryan."</p> <p>14 Q. Would you read the rest of</p> <p>15 that sentence, please.</p> <p>16 A. "Who headed that very same</p> <p>17 Mosnatsbank."</p> <p>18 Q. Keep reading the sentence.</p> <p>19 A. "Whose former managers began</p> <p>20 to die for very strange coincidence of</p> <p>21 circumstances just at the time when they</p> <p>22 mixed with Mr. Safaryan."</p> <p>23 I want to draw your attention</p> <p>24 to what in Russian this particular phrase</p> <p>25 means. In Russian means that the</p>
<p style="text-align: right;">Page 304</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Is Mosnatsbank the same as</p> <p>3 Moscow National Bank?</p> <p>4 A. Yes.</p> <p>5 Q. Does the article say that your</p> <p>6 name appeared in Mr. Safaryan's notebook?</p> <p>7 MR. LUPKIN: Objection.</p> <p>8 A. No.</p> <p>9 Q. Please look at the second to</p> <p>10 last paragraph. I'm sorry, the third to</p> <p>11 last paragraph in the article.</p> <p>12 A. Which one, the third?</p> <p>13 Q. The third to last paragraph.</p> <p>14 A. Probably the second one.</p> <p>15 Q. Does the -- I may have used</p> <p>16 the wrong word. Does the article say</p> <p>17 that in an address book your name was</p> <p>18 found?</p> <p>19 MR. LUPKIN: Objection, the</p> <p>20 document speaks for itself. But</p> <p>21 you may answer.</p> <p>22 A. Absolutely correct, the</p> <p>23 document speaks for itself.</p> <p>24 Q. Well, does the document say</p> <p>25 that your name was found in some kind of</p>	<p style="text-align: right;">Page 306</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 investigators might run into, but it</p> <p>3 doesn't say that they ran into, that they</p> <p>4 saw interesting names.</p> <p>5 You stated this as a fact that</p> <p>6 took place. There's a principle</p> <p>7 difference what might have happened or</p> <p>8 what did happen.</p> <p>9 Q. Would you please read the next</p> <p>10 paragraph.</p> <p>11 A. Which one?</p> <p>12 Q. The next paragraph.</p> <p>13 A. "A mass of curious stories are</p> <p>14 connected with Egiazaryan: Mosnatsbank,</p> <p>15 the budget of the Moscow district, which</p> <p>16 until now cannot forgive Ashot Egiazaryan</p> <p>17 strange manipulations with the properties</p> <p>18 in Daev Lane and so on and so on. But</p> <p>19 the most capital row was around the</p> <p>20 personality of the former prosecutor</p> <p>21 general Yuriy Skuratov." Yuriy,</p> <p>22 Y-u-r-i-i, Skuratov, S-k-u-r-a-t-o-v.</p> <p>23 "In which Ashot Egiazaryan, currently</p> <p>24 deputy chairman of the committee, of the</p> <p>25 budgeting committee of the state Duma,</p>

16 (Pages 303 to 306)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 who is planning to extend his candidacy</p> <p>3 to a new term and his good acquaintance</p> <p>4 Nadir," N-a-d-i-r, "Hapsirokov," Khapsirokov</p> <p>5 H-a-p-s-i-r-o-k-o-v, "former manager,</p> <p>6 business manager of the prosecution, the</p> <p>7 office of the prosecutor general, managed</p> <p>8 to be shown in the, in this case in a</p> <p>9 serious matter."</p> <p>10 Q. Is that the end of the</p> <p>11 paragraph?</p> <p>12 A. Isn't it so? Maybe in Russian</p> <p>13 and English these paragraphs differ.</p> <p>14 Q. What's the last phrase in the</p> <p>15 paragraph?</p> <p>16 A. Well the last word was, I can</p> <p>17 -- I can go on. Let me read it. Well,</p> <p>18 you meant I should read it. I read</p> <p>19 everything to the end.</p> <p>20 Q. What is the phrase in</p> <p>21 quotation marks?</p> <p>22 A. You mean the person, the man</p> <p>23 who looks like the prosecutor general?</p> <p>24 Q. Yes, that phrase. Would you</p> <p>25 read that in quotation marks.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A F T E R N O O N S E S S I O N</p> <p>3 1:55 p.m.</p> <p>4 THE VIDEOGRAPHER: The time is</p> <p>5 1:55 p.m., we're back on the</p> <p>6 record.</p> <p>7 VALERII M. SCHUKIN,</p> <p>8 called as the interpreter in this</p> <p>9 action, resumed, having been</p> <p>10 previously sworn.</p> <p>11 IGOR VESLER,</p> <p>12 called as the check interpreter</p> <p>13 in this action, resumed, having</p> <p>14 been previously sworn.</p> <p>15 ASHOT EGIAZARYAN,</p> <p>16 resumed, having been previously</p> <p>17 duly sworn, was examined and</p> <p>18 testified through the interpreter</p> <p>19 further as follows:</p> <p>20 CONTINUED EXAMINATION</p> <p>21 BY MR. GOLDEN:</p> <p>22 Q. Mr. Egiazaryan, I have shown</p> <p>23 you Exhibit 29 which is in front of you.</p> <p>24 Can you tell me what it is?</p> <p>25 A. It states here "Aleksey</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 A. I've read it once again. "The</p> <p>3 man who looks like the prosecutor general</p> <p>4 rests in an apartment on Polyanka,"</p> <p>5 P-o-l-y-a-n-k-a, "in the society of</p> <p>6 doubtful women."</p> <p>7 MR. GOLDEN: We can break for</p> <p>8 lunch now.</p> <p>9 MR. LUPKIN: I think it really</p> <p>10 depends on the court reporter.</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 1:13 p.m., we're off the record.</p> <p>13 (Luncheon recess: 1:13 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Mitrofanov, the history of the LDPR,</p> <p>3 origins and facts." As far as I know</p> <p>4 this photograph is that of Zhirinovsky</p> <p>5 and there is also my picture here, too.</p> <p>6 And of one of my opponents, Mr. Kerimov.</p> <p>7 Q. What's in front of you is just</p> <p>8 a few pages. Is this a book?</p> <p>9 MR. LUPKIN: Don't guess.</p> <p>10 A. This is a Xerox copy.</p> <p>11 Q. But do you know whether it's a</p> <p>12 photocopy of a book, of the cover of a</p> <p>13 book?</p> <p>14 A. Yes, I've seen it. I've seen</p> <p>15 the book. I saw the book before, about</p> <p>16 two or three days ago for the first time.</p> <p>17 Q. When you saw it two or three</p> <p>18 days ago, did you see the whole book?</p> <p>19 A. No, I only looked at the</p> <p>20 cover. I found myself here, the picture</p> <p>21 in the left bottom corner circled.</p> <p>22 Q. A few days ago when you looked</p> <p>23 at it, did you have in your hands or on</p> <p>24 the table in front of you the entire</p> <p>25 book?</p>

17 (Pages 307 to 310)

Page 311	Page 313
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Yes, fully.</p> <p>3 Q. When was the first time that</p> <p>4 you saw the book?</p> <p>5 MR. LUPKIN: Objection; asked</p> <p>6 and answered. You may answer</p> <p>7 again.</p> <p>8 A. As I have already said, it was</p> <p>9 two or three days ago. The first page</p> <p>10 was blue or light blue.</p> <p>11 Q. Before a few days ago, were</p> <p>12 you aware of the book?</p> <p>13 A. I had not seen it.</p> <p>14 Q. Had you ever met Aleksey</p> <p>15 Mitrofanov?</p> <p>16 A. I know Aleksey Mitrofanov used</p> <p>17 to a member of the state Duma. I</p> <p>18 personally met with him probably about</p> <p>19 two or three times. That is why I cannot</p> <p>20 refer to myself as either his friend or</p> <p>21 his comrade. More than visually, we have</p> <p>22 not met. We have never had tête-à-tête</p> <p>23 conversations.</p> <p>24 Q. What was his role in LDPR?</p> <p>25 A. In the LDPR he was a deputy.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Is Mitrofanov immediately to</p> <p>3 our right of Zhirinovskiy?</p> <p>4 A. Let me see. Yes, you're</p> <p>5 right.</p> <p>6 Q. Do you know why the 23 or 24</p> <p>7 people who are on the cover were chosen</p> <p>8 to be on the cover by whoever prepared</p> <p>9 the book?</p> <p>10 A. I did not make that choice,</p> <p>11 probably the one who published the book</p> <p>12 did that and I would say rather those</p> <p>13 were the deputies in the LDPR fraction at</p> <p>14 that time.</p> <p>15 Q. Do you remember when this book</p> <p>16 was written?</p> <p>17 A. As I have said already prior</p> <p>18 to that, I saw this book for the first</p> <p>19 time two or three days ago. That's why</p> <p>20 it's difficult for me to state what I</p> <p>21 don't know.</p> <p>22 Q. Didn't you say you had heard</p> <p>23 about the book before a few days ago?</p> <p>24 A. I did not say about this book</p> <p>25 that I had heard it about it.</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 Then he had a conflict with Zhirinovskiy.</p> <p>3 I don't know the reason for that</p> <p>4 conflict, but there was some major</p> <p>5 conflict.</p> <p>6 Q. You said one of the people on</p> <p>7 the cover was your opponent. Is that Mr.</p> <p>8 Kerimov?</p> <p>9 A. Not was, but is. He remains.</p> <p>10 Q. He remains your opponent?</p> <p>11 Yes?</p> <p>12 A. Yes.</p> <p>13 Q. Which picture on the cover is</p> <p>14 Mr. Kerimov?</p> <p>15 A. This one.</p> <p>16 THE INTERPRETER: The</p> <p>17 interpreter's remark: Indicating</p> <p>18 to the very bottom picture, second</p> <p>19 from right.</p> <p>20 Q. And which one is you?</p> <p>21 A. As I've already said, in the</p> <p>22 left bottom corner.</p> <p>23 Q. Is the person in the middle on</p> <p>24 the bottom Zhirinovskiy's son?</p> <p>25 A. Quite correct.</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. In 2007, approximately how</p> <p>3 many LDPR deputies were in The Duma?</p> <p>4 MR. LUPKIN: Excuse me just</p> <p>5 one second. You say the LDPR, you</p> <p>6 mean the fraction?</p> <p>7 MR. GOLDEN: Well, I said the</p> <p>8 LDPR deputies.</p> <p>9 MR. LUPKIN: Right, so my</p> <p>10 question is members of the fraction</p> <p>11 or members of the party?</p> <p>12 MR. GOLDEN: I mean LDPR</p> <p>13 deputies.</p> <p>14 MR. LUPKIN: Note my</p> <p>15 objection. You may answer.</p> <p>16 A. I just don't remember.</p> <p>17 Q. Would you turn to the third</p> <p>18 page of this exhibit, please. I</p> <p>19 misspoke, I meant the fourth page.</p> <p>20 Please read the top part of the page.</p> <p>21 A. "Mitrofanov, the history of</p> <p>22 the LDPR, origins and facts."</p> <p>23 Q. Below that what does it say?</p> <p>24 A. "Chapter number 10,</p> <p>25 yesterday's and today's cadre of the LD</p>

18 (Pages 311 to 314)

Page 315	Page 317
<p>1 ASHOT EGIАЗARYAN 2 staff." 3 MR. VESLER: Officials. It's 4 not just the personnel. 5 THE INTERPRETER: Okay, we can 6 say officials of the LDPR. 7 A. 1994-2006. 8 Q. Next there's a large paragraph 9 beneath your name. Do you see that? 10 A. Shall I read it? 11 Q. Well, first I just want you to 12 tell me if that is under your name? 13 A. The paragraph starts with my 14 name. 15 Q. And is what is contained under 16 your name a summary of biographical 17 information? 18 MR. LUPKIN: Please review it. 19 A. May I read it? 20 Q. Yes. 21 A. I've read it. 22 Q. Is that biographical summary 23 accurate? 24 A. No, not accurate. 25 Q. What is inaccurate?</p>	<p>1 ASHOT EGIАЗARYAN 2 Prof-Media as a general director. I did 3 not work there at all. Just a mistake. 4 Q. Were you an investor in Prof- 5 Media company? 6 A. No. 7 Q. Did you have anything to do 8 with Prof-Media company? 9 A. Well, maybe the maximum that I 10 did may be conducting some negotiations 11 or consultations. There could have been 12 some negotiations. 13 Q. It says -- 14 A. Just a mistake, it happens. 15 Q. It says you were the chairman 16 of Moscow National Bank. That's correct, 17 right? 18 A. I've already answered your 19 question on several occasions. Yes, it 20 is true. 21 Q. It said that you worked as an 22 engineer at the Moscow Silk Factory. Is 23 that correct. 24 THE INTERPRETER: Silk, 25 S-i-l-k?</p>
Page 316	Page 318
<p>1 ASHOT EGIАЗARYAN 2 A. Many facts are inaccurate. 3 Q. Would you identify two or 4 three that are inaccurate? 5 A. I can. I'm going to tell you 6 in a minute. It's written here the bank 7 Transcredit. I'm not aware of such a 8 bank and did not participate in it. 9 Also, it says the general 10 director of the company Prof-Media. I 11 was not the director of Prof-Media. 12 Also a member of the Liberal 13 Democratic Party of Russia, which also 14 does not correspond with the reality. 15 Well, at first glance three 16 inconsistencies. 17 Q. Where it says that you were 18 the director general of Prof-Media 19 company, did you have no connection to 20 Prof-Media company? 21 THE INTERPRETER: Your 22 question was were you ever? 23 Q. I'll ask a different question. 24 What is inaccurate about that sentence? 25 A. I did not work at the company</p>	<p>1 ASHOT EGIАЗARYAN 2 MR. GOLDEN: Yes. 3 A. Yes, I did say it is true. 4 Q. It says that you were the 5 director general of the Fund for Social 6 and Economic Development. Is that 7 correct? 8 A. Yes, I have said that on many 9 occasions that is true. 10 Q. It says that you were the 11 chairman of the board of 000 KB Russian 12 House. Is that correct? 13 A. Yes, that is correct. 14 Q. What was that business? 15 A. Which business of them? 16 Q. 000 KB Russian House? 17 A. KB Russian House was a 18 commercial bank which operates today. 19 Banking business, servicing clients, 20 physical personalities, legal entities, 21 credit cards, a successful bank. 22 Q. How long were you the 23 chairman? 24 A. Well I can say several years. 25 Approximately that was starting in 1995</p>

19 (Pages 315 to 318)

Page 319	Page 321
<p>1 ASHOT EGIAZARYAN</p> <p>2 or maybe in 1996, probably for three or</p> <p>3 four years. I can even say more. I was</p> <p>4 the one who created that bank.</p> <p>5 Q. When did you create the bank?</p> <p>6 A. Sometime in the mid-nineties.</p> <p>7 Q. Were you a majority owner of</p> <p>8 the bank?</p> <p>9 A. Yes.</p> <p>10 Q. Did you sell your ownership of</p> <p>11 the bank?</p> <p>12 A. Yes.</p> <p>13 Q. When did you sell it?</p> <p>14 A. It was sold at the end,</p> <p>15 sometime in '96, '98, '99, '98, during</p> <p>16 that period of time.</p> <p>17 Q. Do you remember approximately</p> <p>18 how much you sold it for?</p> <p>19 A. I cannot tell you.</p> <p>20 Q. For how long were you the vice</p> <p>21 chairman of The Duma's budget and taxes</p> <p>22 committee?</p> <p>23 A. I was there from 2000 to 2003.</p> <p>24 And from 2003 till 2007.</p> <p>25 Q. Were you on the budget and</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 in The Duma?</p> <p>3 A. Not among the deputies. The</p> <p>4 important position at The Duma is the</p> <p>5 chairman of the committee. In this case,</p> <p>6 the chairman of a committee, any</p> <p>7 committee acquires certain privileges.</p> <p>8 That's why it is more important. Just a</p> <p>9 member of a committee or vice chairman of</p> <p>10 a committee, they are equal in their</p> <p>11 rights and do not possess important</p> <p>12 privileges.</p> <p>13 Q. Did the budget and taxes</p> <p>14 committee have more than one vice</p> <p>15 chairman?</p> <p>16 A. I would say much more than</p> <p>17 one, I would say about five, six or seven</p> <p>18 people.</p> <p>19 Q. There were five, six or seven</p> <p>20 vice chairmen, is that what you're</p> <p>21 saying?</p> <p>22 A. Yes.</p> <p>23 Q. Turning back to the page in</p> <p>24 front of you, please read so the</p> <p>25 translator can translate the second</p>
Page 320	Page 322
<p>1 ASHOT EGIAZARYAN</p> <p>2 taxes committee after 2007?</p> <p>3 A. Yes, I was.</p> <p>4 Q. Were you -- until you were,</p> <p>5 until you left The Duma, were you a</p> <p>6 member of the budget and taxes committee?</p> <p>7 A. Prior to my exiting The Duma,</p> <p>8 I --</p> <p>9 THE INTERPRETER: I'm sorry, I</p> <p>10 have to verify that.</p> <p>11 A. I exited Duma about a month</p> <p>12 ago. Prior to that, I was a member of</p> <p>13 The Duma and a member of the budget and</p> <p>14 taxes, taxation committee.</p> <p>15 Q. When you were the vice</p> <p>16 chairman, did somebody appoint you to be</p> <p>17 the vice chairman?</p> <p>18 A. Yes.</p> <p>19 Q. Who appointed you?</p> <p>20 A. The Duma.</p> <p>21 Q. Was it a person who appointed</p> <p>22 you?</p> <p>23 A. They voted. Deputies vote and</p> <p>24 they appoint.</p> <p>25 Q. Is that an important position</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 paragraph.</p> <p>3 A. The second one?</p> <p>4 Q. The second one, yes.</p> <p>5 A. This one?</p> <p>6 Q. Yes.</p> <p>7 A. "365 vice chairmen of the</p> <p>8 committee of the state Duma for budget</p> <p>9 and taxes, taxation. Member of the</p> <p>10 Liberal Democratic Party of Russia. A</p> <p>11 member of the fraction of the LDPR. Vice</p> <p>12 chairman of the budget and taxation</p> <p>13 committee of the state Duma."</p> <p>14 May I bring some coffee for</p> <p>15 me?</p> <p>16 Q. Yes.</p> <p>17 MR. LUPKIN: I guess we're</p> <p>18 going off the record for a second.</p> <p>19 THE VIDEOGRAPHER: This will</p> <p>20 end tape 6 of the deposition of</p> <p>21 Ashot Egiazaryan. The time is</p> <p>22 2:24, we're off the record.</p> <p>23 (A recess was taken.)</p> <p>24 THE VIDEOGRAPHER: This is the</p> <p>25 start of tape number 7 in the</p>

20 (Pages 319 to 322)

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<p>1 ASHOT EGIAZARYAN 2 deposition of Ashot Egiazaryan. 3 The time is 2:28 p.m., we're on the 4 record. 5 MR. GOLDEN: I'm going to ask 6 questions about subjects that are 7 within the attorneys' eyes only 8 confidentiality restrictions, so 9 I'll ask the court reporter to note 10 that on the transcript and also to 11 note that Mr. Muranov is not in the 12 room. 13 MR. LUPKIN: Thank you. 14 (At this time, Mr. Muranov 15 left the deposition room.) 16 (The following testimony 17 contained was designated 18 confidential, attorneys' eyes only 19 and bound separately:) 20 21 22 23 24 25</p>	<p>1 ASHOT EGIAZARYAN 2 Q. Is Gibson, Dunn involved in 3 your arbitration in London against Mr. 4 Kerimov? 5 A. Yes. 6 Q. Did BGR write press releases 7 for you? 8 A. Yes. 9 Q. I may have asked you this 10 before, if I did, I apologize. How much 11 money have you paid BGR, approximately? 12 MR. LUPKIN: Objection; asked 13 and answered. You may answer it 14 again. 15 A. I don't remember. 16 Q. Do you know what is the dollar 17 amount of your damage claim in this case? 18 A. In what claim? 19 Q. All your claims? 20 A. There are several of them. 21 Q. All your claims? 22 A. Over 2.5 billion. 23 Q. I meant your claim not in 24 London, your claim in the lawsuit that 25 brings us here today?</p>
Page 375	Page 377
<p>1 ASHOT EGIAZARYAN 2 (At this time, Mr. Muranov 3 returned to the deposition room.) 4 Q. Mr. Egiazaryan, there exists 5 in this case a contract on your behalf 6 with BGR. The contract was made by 7 Gibson, Dunn. The contract is in 8 English. Did anybody ever explain it to 9 you? 10 A. I did not ask. 11 Q. Whose idea was it to retain 12 BGR? 13 A. The idea, the initiative was 14 mine. It was Gibson, Dunn who 15 recommended that to me. 16 Q. The idea -- let me just repeat 17 to make sure I understood. The idea to 18 hire a PR agency was yours, is that what 19 you said? 20 A. The initiative to hire a PR 21 agency was mine. 22 Q. And you said that the specific 23 recommendation of BGR came from Gibson, 24 Dunn; is that right? 25 A. Correct.</p>	<p>1 ASHOT EGIAZARYAN 2 A. Well, you just mentioned about 3 Kerimov in your previous question, that 4 your question was. That's why I 5 responded that way. 6 Q. I understand how I confused 7 you. So I'm correcting it. My question 8 is what is your damage claim in the case 9 that brings us all here today? 10 A. Well the damage claim and the 11 expenses related to this claim, they are 12 constantly growing and at this given 13 moment I cannot tell you. Later on -- 14 later on a specific amount will be 15 determined. 16 Q. What do you think is your net 17 worth today? 18 MR. LUPKIN: Objection; asked 19 and answered, but you can answer it 20 again. 21 A. At this given moment? 22 Q. Yes. 23 A. Or for some year? 24 Q. At this moment. 25 A. At this moment, it's negative.</p>

21 (Pages 323 to 377)

Page 378	Page 380
<p>1 ASHOT EGIAZARYAN</p> <p>2 Q. What are the assets that you</p> <p>3 have today?</p> <p>4 A. What are?</p> <p>5 Q. What assets do you own today?</p> <p>6 (Instruction not to answer.)</p> <p>7 MR. LUPKIN: Excuse me, before</p> <p>8 you answer that question, may I ask</p> <p>9 why you're asking this line of</p> <p>10 questioning, why it's relevant to</p> <p>11 the claim?</p> <p>12 MR. GOLDEN: To understand --</p> <p>13 it's relevant to his motivations</p> <p>14 and to evaluate the credibility of</p> <p>15 other things he's said.</p> <p>16 MR. LUPKIN: I'm going to</p> <p>17 direct the witness not to answer</p> <p>18 that.</p> <p>19 Q. Do you consider your claim</p> <p>20 against Kerimov to be an asset?</p> <p>21 A. I do not quite understand the</p> <p>22 question.</p> <p>23 Q. I will ask another question.</p> <p>24 Do you remember a time in February of</p> <p>25 2011 when you met with an Associated</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Greenberg did.</p> <p>3 Q. What was the reason for the</p> <p>4 meeting?</p> <p>5 A. Probably I can only make a</p> <p>6 supposition.</p> <p>7 Q. What did you think was the</p> <p>8 purpose of the meeting?</p> <p>9 A. I think that probably the</p> <p>10 reporter had some interest in me, had</p> <p>11 questions to me.</p> <p>12 Q. But why did Greenberg contact</p> <p>13 the reporter to arrange the meeting?</p> <p>14 A. I expressed my supposition.</p> <p>15 It is slightly different from your</p> <p>16 statement, from your question.</p> <p>17 Q. Maybe I misunderstood you.</p> <p>18 Didn't you say that Greenberg arranged</p> <p>19 the meeting with the reporter?</p> <p>20 A. Yes, but I think it would</p> <p>21 rather happen on the initiative of the</p> <p>22 reporter.</p> <p>23 Q. How would the reporter know to</p> <p>24 contact Greenberg about talking to you?</p> <p>25 A. Well, one probably has to ask</p>
Page 379	Page 381
<p>1 ASHOT EGIAZARYAN</p> <p>2 Press reporter named Douglas Birch?</p> <p>3 A. Yes. What month it was in?</p> <p>4 Q. February -- let me clarify</p> <p>5 that. The article was written on</p> <p>6 February 6th, 2011. The meeting was</p> <p>7 sometime before February 6th. You</p> <p>8 remember the meeting?</p> <p>9 A. Yes.</p> <p>10 Q. Who was present at the</p> <p>11 meeting?</p> <p>12 A. The company Greenberg was</p> <p>13 present at the meeting.</p> <p>14 Q. Was anybody from BGR present?</p> <p>15 A. No.</p> <p>16 Q. Who from Greenberg was</p> <p>17 present?</p> <p>18 A. There was Sandy present from</p> <p>19 Greenberg, and Don.</p> <p>20 Q. Who is Don?</p> <p>21 A. A lawyer working at Greenberg.</p> <p>22 Q. Was the meeting, was the</p> <p>23 meeting in Greenberg's office?</p> <p>24 A. Yes.</p> <p>25 Q. Who arranged for the meeting?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 in that case Greenberg or the reporter.</p> <p>3 I did not talk on that topic, I did not</p> <p>4 clarify.</p> <p>5 Q. Did you speak at the meeting?</p> <p>6 A. Yes.</p> <p>7 Q. Did somebody translate your</p> <p>8 Russian for the reporter?</p> <p>9 A. But he speaks Russian.</p> <p>10 Q. Douglas Birch speaks Russian?</p> <p>11 A. I think he spoke Russian.</p> <p>12 Maybe there was an interpreter, but I</p> <p>13 somehow paid my attention that he did</p> <p>14 speak Russian.</p> <p>15 Q. Mr. Birch wrote another</p> <p>16 article on March 9, 2011. Did you meet</p> <p>17 with him again?</p> <p>18 A. I don't remember this.</p> <p>19 Q. Do you know --</p> <p>20 A. I met with him once and that</p> <p>21 is for sure. Maybe we met again. I just</p> <p>22 don't remember.</p> <p>23 Q. Do you know who provided</p> <p>24 information to Mr. Birch for his second</p> <p>25 article?</p>

22 (Pages 378 to 381)

Page 382	Page 384
<p>1 ASHOT EGIAZARYAN</p> <p>2 A. Let me read the second</p> <p>3 article, then I can comment. I just</p> <p>4 don't remember what was written in the</p> <p>5 first article and in the second article.</p> <p>6 Q. Would you show the witness</p> <p>7 Exhibit 31, please, it's the second</p> <p>8 article.</p> <p>9 A. Do you have the Russian</p> <p>10 version?</p> <p>11 Q. I don't.</p> <p>12 A. Too bad.</p> <p>13 Q. Should we go on to another</p> <p>14 question or do you want the translator to</p> <p>15 read, to translate this for you?</p> <p>16 A. I would like that to be</p> <p>17 translated.</p> <p>18 Q. Go ahead.</p> <p>19 (At this time, the requested</p> <p>20 material was read to the witness.)</p> <p>21 Q. So I think that the</p> <p>22 outstanding question was do you know who</p> <p>23 gave information to Mr. Birch for the</p> <p>24 article that was just read to you?</p> <p>25 A. Greenberg could have given</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 your behalf?</p> <p>3 MR. LUPKIN: Just wait.</p> <p>4 Finish translating. Are you</p> <p>5 finished?</p> <p>6 THE INTERPRETER: Yes.</p> <p>7 MR. LUPKIN: I want to</p> <p>8 interpose an objection. Assumes</p> <p>9 facts not in evidence and lacks</p> <p>10 foundation. You may answer.</p> <p>11 A. I remember the fact that there</p> <p>12 was a letter but I need to read the text.</p> <p>13 Q. Did you write it?</p> <p>14 A. It had been prepared.</p> <p>15 Q. Who --</p> <p>16 A. Based on my comments.</p> <p>17 Q. Who prepared it?</p> <p>18 A. Probably it was the BGR.</p> <p>19 Usually the way it is done, whatever the</p> <p>20 BGR prepares is coordinated, this is</p> <p>21 coordinated with the lawyers, they look</p> <p>22 at it, then they submit it -- submit it</p> <p>23 to me.</p> <p>24 Q. And does somebody read it to</p> <p>25 you or translate it for you?</p>
Page 383	Page 385
<p>1 ASHOT EGIAZARYAN</p> <p>2 this information. I don't remember.</p> <p>3 Maybe it was me who talked to him, I just</p> <p>4 don't remember. I had some telephone</p> <p>5 conversations with him at this or at</p> <p>6 another moment, I just don't remember.</p> <p>7 Q. In response to Mr. Zalmayev's</p> <p>8 commentary in the Jewish Journal there</p> <p>9 was a letter that appeared over your</p> <p>10 name. Do you remember that?</p> <p>11 THE INTERPRETER: In the</p> <p>12 Jewish newspaper?</p> <p>13 MR. GOLDEN: Yes.</p> <p>14 MR. LUPKIN: It's called the</p> <p>15 Jewish Journal, that's the name of</p> <p>16 it.</p> <p>17 A. What was the question?</p> <p>18 Q. Do you remember the letter</p> <p>19 that was written on your behalf?</p> <p>20 MR. LUPKIN: Objection; lacks</p> <p>21 foundation. You may answer.</p> <p>22 A. Well maybe I should take a</p> <p>23 look at this.</p> <p>24 Q. I don't have it handy. Do you</p> <p>25 remember the letter that was written on</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 A. It could have been in Russian</p> <p>3 and they could have read it over the</p> <p>4 telephone. That was not principal --</p> <p>5 principally important.</p> <p>6 MR. GOLDEN: Mark that next,</p> <p>7 please.</p> <p>8 (Exhibit 150 for</p> <p>9 identification, Bates stamped PZ</p> <p>10 000513 through 516.)</p> <p>11 Q. Mr. Egiazaryan, tell me what</p> <p>12 Exhibit 150 is?</p> <p>13 A. These are the excerpts from</p> <p>14 the transcript, as I can see here, of the</p> <p>15 meeting of the session on June the 28th,</p> <p>16 2001.</p> <p>17 Q. When you say the session, is</p> <p>18 it a Duma session?</p> <p>19 A. It is written here the</p> <p>20 building of the state Duma, the grand</p> <p>21 hall, June 28th, 2001, 10 o'clock. The</p> <p>22 chair is by the chairman of the state</p> <p>23 Duma, G.N. Seleznyov.</p> <p>24 Q. Please look at the second</p> <p>25 page. Is the second, does the second</p>

23 (Pages 382 to 385)

ASHOT EGIAZARYAN - 1/19/2012

<p style="text-align: right;">Page 386</p> <p>1 ASHOT EGIAZARYAN 2 page show the vote on June 28 for members 3 of the LDPR faction? 4 MR. LUPKIN: I caution the 5 witness not to speculate and only 6 answer if he knows. 7 A. Let me look. I cannot 8 understand which was the issue. 9 Q. Is that the record of some 10 vote of the members of the LDPR faction? 11 MR. LUPKIN: Same caution, 12 don't speculate. 13 A. It's interesting that it says, 14 this is what I don't quite understand, I 15 have to understand it. It says here 16 Mitrofanov using Slutsky's card. How can 17 it be Mitrofanov on Slutsky's card. 18 Mitrofanov has his own card. 19 Q. Well that's on the first page, 20 I'm referring to the second page. 21 A. Well but that refers to the 22 first page. 23 Q. My question is about the 24 second page. Did you ever see a record 25 of votes in this form?</p>	<p style="text-align: right;">Page 388</p> <p>1 ASHOT EGIAZARYAN 2 Mitrofanov acting on Slutsky's card. 3 Q. When you testified 4 yesterday -- 5 A. Well, this is what, a 6 different document already is it the 7 same? Because the dates are different. 8 Q. The two documents are 9 different, but I have a question that's 10 not about the document. Yesterday you 11 described voting in The Duma where the 12 cards of deputies were used by other 13 people to vote. Do you remember when you 14 explained that? 15 A. Correct. 16 Q. When the votes were done in 17 that way, would the electronic system 18 record a vote for the name of a Duma 19 deputy who was not present? 20 MR. LUPKIN: Objection to 21 form. You may answer. 22 A. Yes. A person, a member of 23 the Parliament may not be at The Duma and 24 somebody, well, the same person who votes 25 can push the button.</p>
<p style="text-align: right;">Page 387</p> <p>1 ASHOT EGIAZARYAN 2 A. You mean the vote in this form 3 what? 4 Q. Yes, I mean the votes recorded 5 in the form in which it appears on the 6 second page? 7 A. And what is your question? 8 Q. What was his answer? The 9 question is have you ever seen the votes 10 recorded for the LDPR faction in the form 11 in which it appears on the second page? 12 A. No. 13 MR. GOLDEN: Mark this next, 14 please. 15 (Exhibit 151 for 16 identification, Bates stamped PZ 17 000493 through 496.) 18 A. I think that was the issue 19 that was presented by Mitrofanov against 20 the surrender of Milosevic to going's 21 tribunal. 22 Q. And what was Mitrofanov's 23 position on that? 24 A. I was not present at that 25 session, that's why I don't know. This</p>	<p style="text-align: right;">Page 389</p> <p>1 ASHOT EGIAZARYAN 2 Q. And would it record the vote 3 for somebody who was not present? 4 A. Certainly. 5 MR. GOLDEN: Next, please. 6 (Exhibit 152 for 7 identification, Bates stamped PZ 8 000491 through 492.) 9 MR. LUPKIN: I'm sorry, Jim, 10 did we mark 151 and not use it? 11 MR. GOLDEN: Correct, I did 12 mark it and I did not ask any 13 questions. 14 MR. LUPKIN: So we're going to 15 keep it marked that way? 16 MR. GOLDEN: Yes. 17 MR. LUPKIN: Would you let the 18 record reflect Exhibit 151 is a 19 document that bears Bates 20 designation 000493, 494 and 495 and 21 496. Please continue. 22 Q. Mr. Egiazaryan, is Exhibit 152 23 about proceedings in The Duma involving 24 whether members of The Duma would stand 25 in silence on September 19, 2001 to</p>

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<p>1 ASHOT EGIАЗARYAN 2 recognize the attacks in New York on 3 September 11, 2001? Is that what this 4 document pertains to? 5 A. Well, I haven't read it yet. 6 MR. LUPKIN: While the witness 7 is reading the document, you don't 8 need to translate that. I see on 9 the screen that the Exhibit 151 has 10 the numbers but doesn't have the 11 prefix for the Bates, it's PZ. 12 A. What was your question about? 13 Q. Did I summarize correctly the 14 subject of this document? 15 MR. GOLDEN: Did you translate 16 the question? 17 THE INTERPRETER: Yes. 18 A. Summarize, what was the 19 summary about? 20 Q. Is this document about whether 21 The Duma would stand in recognition of 22 the attacks in New York in September 23 2001? 24 A. Yes. 25 Q. Did Mr. Mitrofanov oppose the</p>	<p>1 ASHOT EGIАЗARYAN 2 not do anything in The Duma because I 3 physically was not in The Duma. I was in 4 London. London is not a hotel, it's the 5 city in Great Britain. 6 Q. Did Mr. Mitrofanov oppose 7 standing in The Duma that day? 8 MR. LUPKIN: Objection; asked 9 and answered. You may answer 10 again. 11 A. Well, as I already said in my 12 previous response, I was not, I was not 13 present in The Duma because I was in 14 another country. 15 Q. As a member of the -- 16 A. Because the daughter of the 17 friend of mine was physically not far 18 from the World Trade Center on that day 19 in New York. 20 Q. Please stop. None of this, 21 none of this has anything to do with the 22 question. 23 MR. LUPKIN: Excuse me. 24 Excuse me, I don't agree with that 25 and the witness should be permitted</p>
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<p>1 ASHOT EGIАЗARYAN 2 idea of standing in silence? 3 A. Well, maybe we are talking 4 about the Mitrofanov that wrote that book 5 about me with mistakes regarding me. I 6 would gladly comment his actions at that 7 moment if I had been present there. At 8 the time and the day I was in London. 9 Because that was a very memorable moment. 10 I think any person would remember where 11 he physically was at that time, at the 12 time of that tragedy. 13 Q. Do you remember Mr. -- 14 A. As far as I'm concerned, I am 15 in -- I expressed my solidarity with the 16 idea of standing up and being silent for 17 some time as memory of that tragedy. 18 Q. You were not in The Duma that 19 day, right? 20 A. Well, as I've already said, I 21 was in London. 22 Q. So if you were not in The 23 Duma, you did not stand up in The Duma 24 that day, right? 25 A. I did -- I did not -- I did</p>	<p>1 ASHOT EGIАЗARYAN 2 to answer the question. At the 3 very least the translation should 4 be completed. 5 A. Well, for me it's just a very 6 sensitive issue that tragedy because it 7 touched directly on me and at that 8 particular moment regarding my emotions 9 about my feelings. 10 Q. Listen to the question 11 carefully, please. Does this document 12 refer to Mr. Mitrofanov opposing Duma 13 members standing? 14 MR. LUPKIN: Objection; asked 15 and answered and the document 16 speaks for itself. 17 MR. GOLDEN: Will you 18 stipulate that that's what it says 19 because he hasn't acknowledged that 20 yet. But if you stipulate to it, 21 that's fine with me. 22 MR. LUPKIN: Jim, I don't 23 speak Russian so I can't pretend to 24 understand what the document says. 25 MR. GOLDEN: There's an</p>

25 (Pages 390 to 393)

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<p>1 ASHOT EGIАЗARYAN</p> <p>2 English translation.</p> <p>3 MR. LUPKIN: It's a document,</p> <p>4 he hasn't authenticated it and I'm</p> <p>5 not going to stipulate to anything.</p> <p>6 MR. GOLDEN: Then I'm going to</p> <p>7 keep asking the question until he</p> <p>8 answers it.</p> <p>9 MR. LUPKIN: Okay.</p> <p>10 Q. Is that what -- does the</p> <p>11 document refer to Mr. Mitrofanov opposing</p> <p>12 Duma members standing?</p> <p>13 MR. LUPKIN: Will you give me</p> <p>14 a standing objection so I don't</p> <p>15 have to interrupt you?</p> <p>16 MR. GOLDEN: Yes.</p> <p>17 MR. LUPKIN: Thank you.</p> <p>18 A. The material submitted to me</p> <p>19 by you, yes, in some way could be</p> <p>20 interpreted that way.</p> <p>21 Q. Do you remember that there</p> <p>22 were members of the LDPR faction who did</p> <p>23 not stand in The Duma that day?</p> <p>24 MR. LUPKIN: Objection;</p> <p>25 assumes facts not in evidence. You</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 or did not stand up, I don't know because</p> <p>3 I was not there.</p> <p>4 Q. Did anybody tell you that LDPR</p> <p>5 members refused to stand up?</p> <p>6 A. No, I did not talk to anybody</p> <p>7 on this subject. The most important</p> <p>8 thing is my attitude towards this. Well,</p> <p>9 actions of other people I can either be</p> <p>10 critical of them or support them. In</p> <p>11 this case, I'm critical of them.</p> <p>12 Q. Did you express your criticism</p> <p>13 of them?</p> <p>14 MR. LUPKIN: Objection;</p> <p>15 assumes facts not in evidence. You</p> <p>16 may answer.</p> <p>17 A. Once again I'm saying that I'm</p> <p>18 rebuking that and critical of that.</p> <p>19 MR. GOLDEN: Would you mark</p> <p>20 this.</p> <p>21 (Exhibit 153 for</p> <p>22 identification, Bates stamped PZ</p> <p>23 001635 through 1634.)</p> <p>24 Q. Please turn to page 1629,</p> <p>25 that's where the Russian begins. Do you</p>
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<p>1 ASHOT EGIАЗARYAN</p> <p>2 may answer.</p> <p>3 A. Once again, let me repeat my</p> <p>4 response as to the previous question.</p> <p>5 Maybe it is not proper for me to</p> <p>6 speculate regarding Mitrofanov on the</p> <p>7 issues here, but at that, on that day I</p> <p>8 was in another country. That is</p> <p>9 answering your question and it's not the</p> <p>10 second time that I'm doing this. I</p> <p>11 cannot remember what I didn't see and</p> <p>12 where I was not present.</p> <p>13 Q. So you're saying that you</p> <p>14 heard nothing as a Duma deputy about LDPR</p> <p>15 members refusing to stand?</p> <p>16 MR. LUPKIN: Note my</p> <p>17 objection. You may answer.</p> <p>18 A. But your previous question was</p> <p>19 whether I remember or I don't remember.</p> <p>20 I responded to that question that I was</p> <p>21 not present there so that I could</p> <p>22 remember or not remember. I was not</p> <p>23 there. I've already expressed my</p> <p>24 personal attitudes to this. It is</p> <p>25 sharply negative. Whether they stood up</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 know what this is?</p> <p>3 MR. LUPKIN: Please take an</p> <p>4 opportunity to read it, Mr.</p> <p>5 Egiazaryan, so that you can answer</p> <p>6 counsel's question.</p> <p>7 A. It's small print.</p> <p>8 Q. Let me show you some other</p> <p>9 documents.</p> <p>10 MR. GOLDEN: Would you mark</p> <p>11 this.</p> <p>12 (Exhibit 154 for</p> <p>13 identification, Bates stamped PZ</p> <p>14 000478 through 480.)</p> <p>15 MR. LUPKIN: Counsel is going</p> <p>16 to show you something else.</p> <p>17 Q. Exhibit 154 --</p> <p>18 A. I haven't finished reading</p> <p>19 that one.</p> <p>20 Q. I know, we're skipping to</p> <p>21 another document. We'll go back.</p> <p>22 Exhibit 154 is an excerpt from The Moscow</p> <p>23 Times on February 7, 2005?</p> <p>24 MR. GOLDEN: Mr. Translator,</p> <p>25 please read the headline that reads</p>

26 (Pages 394 to 397)

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<p>1 ASHOT EGIAZARYAN</p> <p>2 "Duma slams letter on Jews" to the</p> <p>3 end of that paragraph.</p> <p>4 (At this time, the requested</p> <p>5 material was read to the witness.)</p> <p>6 MR. LUPKIN: I'd just like to</p> <p>7 lodge an objection to the use of</p> <p>8 the excerpt without the complete</p> <p>9 article, but please continue over</p> <p>10 my objection.</p> <p>11 Q. Mr. Egiazaryan, do you</p> <p>12 remember the incident that is described</p> <p>13 in that excerpt?</p> <p>14 A. I failed even to understand</p> <p>15 properly this incident.</p> <p>16 MR. GOLDEN: Mark this next,</p> <p>17 please.</p> <p>18 (Exhibit 155 for</p> <p>19 identification, article from the</p> <p>20 Associated Press dated February 7,</p> <p>21 2005.)</p> <p>22 Q. Mr. Egiazaryan, Exhibit 155 is</p> <p>23 an article from the Associated Press</p> <p>24 dated February 7, 2005. The headline of</p> <p>25 this article says "Duma slams letter on</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 MR. GOLDEN: 20.</p> <p>3 Q. Does that refresh your memory</p> <p>4 at all about this incident?</p> <p>5 A. No, I did not sign it.</p> <p>6 Q. That wasn't the question. The</p> <p>7 question was does it refresh your memory</p> <p>8 about the incident?</p> <p>9 A. There's no need to refresh my</p> <p>10 memory. I know what I did, where I</p> <p>11 participated and where I did not</p> <p>12 participate.</p> <p>13 Q. Do you remember the incident?</p> <p>14 A. I think in my previous</p> <p>15 response I've already answered but I can</p> <p>16 repeat it.</p> <p>17 Q. Do you remember the incident?</p> <p>18 A. I can repeat the third time.</p> <p>19 Not only do I not remember, but I did not</p> <p>20 know about it either.</p> <p>21 MR. GOLDEN: Please read this</p> <p>22 entire article.</p> <p>23 (At this time, the requested</p> <p>24 material was read to the witness.)</p> <p>25 Q. Mr. Egiazaryan, do you</p>
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<p>1 ASHOT EGIAZARYAN</p> <p>2 Jews." I think, but I can't promise you,</p> <p>3 that this is the full article that was</p> <p>4 excerpted in Exhibit 154.</p> <p>5 A. If it is not in Russian,</p> <p>6 please read it to me.</p> <p>7 Q. Before you read it, in 2005 in</p> <p>8 February, a letter signed by 500 people</p> <p>9 was submitted to Russian authorities to</p> <p>10 ban all Jewish organizations. Does that</p> <p>11 description sound familiar to you?</p> <p>12 A. I'm hearing it for the first</p> <p>13 time.</p> <p>14 Q. The Duma adopted a resolution</p> <p>15 condemning that letter. According to</p> <p>16 this article, and I will have the</p> <p>17 translator read all of it to you, 58</p> <p>18 members of the LDPR and Communist and</p> <p>19 Rodina factions voted against the rose</p> <p>20 solution. According to this article, the</p> <p>21 letter itself was actually signed by 20</p> <p>22 members of the Communist LDPR and Rodina</p> <p>23 factions.</p> <p>24 THE INTERPRETER: Did you say</p> <p>25 20?</p>	<p>1 ASHOT EGIAZARYAN</p> <p>2 understand that the article describes a</p> <p>3 declaration by The Duma condemning</p> <p>4 anti-Semitism?</p> <p>5 A. As far as I understood that</p> <p>6 The Duma refused to adopt it.</p> <p>7 Q. The Duma refused to adopt the</p> <p>8 letter that was submitted by, that was</p> <p>9 submitted by the LDPR and other parties?</p> <p>10 MR. LUPKIN: Objection.</p> <p>11 That's a mischaracterization. It</p> <p>12 said that certain of the deputies</p> <p>13 signed. It did not say that the</p> <p>14 LDPR signed on. Are you going to</p> <p>15 withdraw the question and rephrase</p> <p>16 it or am I just going to lodge the</p> <p>17 objection.</p> <p>18 MR. GOLDEN: Please make the</p> <p>19 objection.</p> <p>20 MR. LUPKIN: Please note my</p> <p>21 objection. It mischaracterizes the</p> <p>22 testimony.</p> <p>23 Q. The issue -- what's described</p> <p>24 here is a declaration by The Duma</p> <p>25 condemning the letter. Do you understand</p>

27 (Pages 398 to 401)

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<p>1 ASHOT EGIАЗARYAN</p> <p>2 that?</p> <p>3 A. Yes.</p> <p>4 Q. And according to the article,</p> <p>5 all the members of the LDPR opposed the</p> <p>6 declaration, do you understand that?</p> <p>7 MR. LUPKIN: Objection.</p> <p>8 A. No, I do not understand this.</p> <p>9 Q. Did the LDPR --</p> <p>10 MR. LUPKIN: Excuse me, he's</p> <p>11 in the middle of an answer.</p> <p>12 A. I was not there.</p> <p>13 Q. I'm talking about the article.</p> <p>14 You did understand the article as it was</p> <p>15 read to you, correct?</p> <p>16 A. Yes.</p> <p>17 Q. So does the article describe</p> <p>18 that all the members of the LDPR voted</p> <p>19 against the declaration condemning</p> <p>20 anti-Semitism?</p> <p>21 MR. LUPKIN: Objection;</p> <p>22 mischaracterizes the article.</p> <p>23 A. Let me explain once again and</p> <p>24 repeat what I had said before. Well</p> <p>25 judging from what was read to me, in all</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 LDPR's position because that's not</p> <p>3 what it says.</p> <p>4 Q. Mr. Egiazaryan, the last, the</p> <p>5 second to last sentence says "The votes</p> <p>6 against the declaration came from the</p> <p>7 communists and the ultra-nationalist</p> <p>8 LDPR."</p> <p>9 Did you understand that when</p> <p>10 the translator read it before?</p> <p>11 A. Yes, I did understand that.</p> <p>12 The only thing is I would like to get</p> <p>13 back to your note, your remark. Well</p> <p>14 Putin condemned in principle what was</p> <p>15 written but not the position specifically</p> <p>16 quoted fractions. That in other words,</p> <p>17 he condemned some people and did not</p> <p>18 condemn other people. He condemned the</p> <p>19 whole issue as far as I could hear from</p> <p>20 the translation.</p> <p>21 Q. According to this article, on</p> <p>22 the question of anti-Semitism, was Putin</p> <p>23 on the LDPR side or was he opposed to the</p> <p>24 LDPR?</p> <p>25 (Instruction not to answer.)</p>
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<p>1 ASHOT EGIАЗARYAN</p> <p>2 probability, there was voting there, on</p> <p>3 the -- on this declaration. There had</p> <p>4 been a letter that was signed by a</p> <p>5 certain number of people. I'm seeing</p> <p>6 this --</p> <p>7 THE INTERPRETER: The</p> <p>8 interpreter's remark, indicating</p> <p>9 with his finger to Exhibit 155.</p> <p>10 A. I'm seeing this for the first</p> <p>11 time right now while I'm sitting here. I</p> <p>12 was not in the hall and I did not vote.</p> <p>13 If you're interested in my opinion, yes,</p> <p>14 naturally, I sharply condemned that.</p> <p>15 Q. Do you understand that the</p> <p>16 article says that Vladimir Putin also</p> <p>17 condemned the position of the LDPR?</p> <p>18 MR. LUPKIN: Objection. That</p> <p>19 mischaracterizes the article and</p> <p>20 what's represented in the article.</p> <p>21 MR. GOLDEN: John, is it your</p> <p>22 position that Vladimir Putin was in</p> <p>23 favor of the LDPR's position?</p> <p>24 MR. LUPKIN: No, I take issue</p> <p>25 with the fact that it was the</p>	<p>1 ASHOT EGIАЗARYAN</p> <p>2 MR. LUPKIN: Objection and I'm</p> <p>3 going to direct the witness not to</p> <p>4 answer at this point. This is</p> <p>5 bordering on harassment and it also</p> <p>6 mischaracterizes this article. So</p> <p>7 I'm going to move to terminate at</p> <p>8 the appropriate time.</p> <p>9 MR. GOLDEN: You're directing</p> <p>10 him not to answer this question?</p> <p>11 MR. LUPKIN: Yes, I am.</p> <p>12 MR. GOLDEN: Okay, I'll go</p> <p>13 onto something else. I would ask,</p> <p>14 though, that you personally as</p> <p>15 lawyers read the letter because I</p> <p>16 think it's important.</p> <p>17 MR. ZAUDERER: What does that</p> <p>18 mean?</p> <p>19 MR. LUPKIN: I'm not sure what</p> <p>20 that means.</p> <p>21 MR. GOLDEN: It was a request</p> <p>22 that I'm making to you as lawyers</p> <p>23 to read the letter that was the</p> <p>24 subject of that questioning, that's</p> <p>25 all.</p>

28 (Pages 402 to 405)

<p style="text-align: right;">Page 406</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. ZAUDERER: For what</p> <p>3 purpose?</p> <p>4 MR. GOLDEN: I think you'll be</p> <p>5 interested.</p> <p>6 MR. ZAUDERER: I'm reading a</p> <p>7 good book too.</p> <p>8 MR. GOLDEN: Mark this next.</p> <p>9 (Exhibit 156 for</p> <p>10 identification, article dated</p> <p>11 2001.)</p> <p>12 A. I see that the print is</p> <p>13 getting smaller and smaller. Are you</p> <p>14 doing this on purpose?</p> <p>15 Q. Exhibit 156 is an article that</p> <p>16 I think is dated the, I think the date is</p> <p>17 sometime in 2001. Can you read the</p> <p>18 headline?</p> <p>19 A. "Khapsirokov was born in</p> <p>20 Egiazaryan's shirt."</p> <p>21 Q. Who is Khapsirokov?</p> <p>22 A. Khapsirokov worked in the</p> <p>23 administration of the president of the</p> <p>24 Russian Federation and he had the</p> <p>25 position of the assistant, assistant to</p>	<p style="text-align: right;">Page 408</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 save time. I sent it to save time.</p> <p>3 I just wondered if you showed him</p> <p>4 any that you tell me and we can</p> <p>5 save time by me asking him</p> <p>6 questions.</p> <p>7 MR. LUPKIN: Why don't we move</p> <p>8 on.</p> <p>9 Q. Please read the article.</p> <p>10 THE VIDEOGRAPHER: This will</p> <p>11 end tape 8 in the deposition of</p> <p>12 Ashot Egiazaryan. The time is 6:01</p> <p>13 p.m., we're off the record.</p> <p>14 (A recess was taken.)</p> <p>15 THE VIDEOGRAPHER: This is the</p> <p>16 start of tape number 9 in the</p> <p>17 deposition of Ashot Egiazaryan.</p> <p>18 The time is 6:03 p.m., we're back</p> <p>19 on the record.</p> <p>20 Q. Have you finished the article?</p> <p>21 A. Yes.</p> <p>22 Q. Were you keeping track of how</p> <p>23 many times your name was mentioned?</p> <p>24 A. No. Well, I won't be able to</p> <p>25 read it the second time.</p>
<p style="text-align: right;">Page 407</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 the head of the administration of the</p> <p>3 president.</p> <p>4 Q. Is the print in this article</p> <p>5 too small for you to read?</p> <p>6 A. Well, but I'm going to make an</p> <p>7 effort, strain myself and read it.</p> <p>8 Q. If it's too difficult we'll</p> <p>9 skip it, I'll show you a different one.</p> <p>10 A. That's okay, I'll read it.</p> <p>11 Q. Before you do, I want to ask a</p> <p>12 question. This is another article that I</p> <p>13 sent to your lawyers on Monday. Did they</p> <p>14 show this to you before the deposition?</p> <p>15 A. I have not seen it.</p> <p>16 MR. GOLDEN: To save</p> <p>17 questioning, let me ask the lawyers</p> <p>18 a question. Did you show the</p> <p>19 witness any of the ten or eleven</p> <p>20 articles that I sent you on Monday?</p> <p>21 MR. LUPKIN: What we do in our</p> <p>22 prep sessions is, respectfully,</p> <p>23 none of your business.</p> <p>24 MR. GOLDEN: Well it's a</p> <p>25 question of, it's a question to</p>	<p style="text-align: right;">Page 409</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Who is Khapsirokov?</p> <p>3 A. I've already responded to this</p> <p>4 question. I can respond again. This is</p> <p>5 a person who until recently worked as</p> <p>6 assistant to the manager or the head of</p> <p>7 the administration of the president of</p> <p>8 the Russian Federation.</p> <p>9 Q. It describes his involvement</p> <p>10 with an organization called</p> <p>11 Interprivatizatsiya; is that right?</p> <p>12 A. That name is mentioned in the</p> <p>13 article.</p> <p>14 Q. Does the article say that he</p> <p>15 stole money from that organization?</p> <p>16 A. It seems to me it does mention</p> <p>17 that.</p> <p>18 Q. Does the article say that he</p> <p>19 did a lot of plans together with</p> <p>20 ill-famed banker Ashot Egiazaryan?</p> <p>21 A. The article says that he is</p> <p>22 relate -- has or had relations with Ashot</p> <p>23 Egiazaryan.</p> <p>24 Q. Does the article say that the</p> <p>25 two of you together were responsible for</p>

<p style="text-align: right;">Page 410</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 the destruction of Mosnatsbank and</p> <p>3 Unikombank?</p> <p>4 A. I did not pay attention.</p> <p>5 Q. Does the article say that in</p> <p>6 the eighties you lived in the United</p> <p>7 States and made business with the aid of</p> <p>8 bosses of the Armenian diaspora in</p> <p>9 California?</p> <p>10 A. Yes, it says so. The only</p> <p>11 thing is -- yes, it mentions that, but it</p> <p>12 also mentions many other things. I will</p> <p>13 gladly answer your question which is</p> <p>14 going to follow this article. Well, what</p> <p>15 is written here is complete nonsense. I</p> <p>16 will discuss it with pleasure with you.</p> <p>17 In the eighties I was not in California</p> <p>18 with or without bosses. Generally, I did</p> <p>19 not live in -- well, but this is not the</p> <p>20 only inconsistency that is written, that</p> <p>21 is mentioned in the article.</p> <p>22 Q. Please stop. I didn't ask --</p> <p>23 I didn't --</p> <p>24 A. It also says that I was the</p> <p>25 chairman of the budget committee which I</p>	<p style="text-align: right;">Page 412</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. That in the initial list for</p> <p>3 the LDPR faction there were 17 people</p> <p>4 ahead of you, that you were number 18?</p> <p>5 Does it say that?</p> <p>6 A. Yes, it says so.</p> <p>7 Q. Does it say that your position</p> <p>8 was switched with number 17 at the</p> <p>9 request of Zhirinovsky so that you could</p> <p>10 get into The Duma?</p> <p>11 A. Yes, the article mentions the</p> <p>12 numbers in the list.</p> <p>13 Q. Does the article say "From</p> <p>14 certain sources it is known that</p> <p>15 Egiazaryan and Zhirinovsky had financial</p> <p>16 arrangements for \$3 million"?</p> <p>17 A. Let me look. I did not pay</p> <p>18 attention maybe because of the small</p> <p>19 print. Can you tell me which paragraph</p> <p>20 this is?</p> <p>21 Q. The seventh paragraph from the</p> <p>22 bottom, last sentence.</p> <p>23 A. Did you find about the money</p> <p>24 here? I found that paragraph about</p> <p>25 Zhirinovsky.</p>
<p style="text-align: right;">Page 411</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 was never.</p> <p>3 Q. Please stop. That was not my</p> <p>4 question. I'm going to ask questions</p> <p>5 about what's in the article. I didn't</p> <p>6 ask you whether they are true.</p> <p>7 A. Well it would have been</p> <p>8 senseless to ask those questions.</p> <p>9 Q. The article describes your</p> <p>10 election to the state Duma, doesn't it?</p> <p>11 Does it say that in the initial --</p> <p>12 MR. LUPKIN: Excuse me, I</p> <p>13 don't think there was an answer.</p> <p>14 A. Yes, there is a mention here.</p> <p>15 Q. Does the article say that --</p> <p>16 A. I read about it.</p> <p>17 Q. -- that in the initial list</p> <p>18 for the LDPR faction there were 17 people</p> <p>19 ahead of you, that you were number 18?</p> <p>20 Does it say that Zhirinovsky asked --</p> <p>21 MR. LUPKIN: Do you want an</p> <p>22 answer to that question?</p> <p>23 MR. GOLDEN: I thought he did.</p> <p>24 A. But I did not hear the</p> <p>25 question.</p>	<p style="text-align: right;">Page 413</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Q. Please read the last sentence.</p> <p>3 A. It's not that simple.</p> <p>4 Honestly, I cannot see it, read it to me.</p> <p>5 THE INTERPRETER: The</p> <p>6 interpreter's remark. He's asking</p> <p>7 the interpreter. I finished</p> <p>8 reading this in Russian to him,</p> <p>9 paragraph 7, which starts with the</p> <p>10 words "But the most daring</p> <p>11 operation that Egiazaryan</p> <p>12 conducted."</p> <p>13 Q. It's the next paragraph. It's</p> <p>14 the last sentence of the next paragraph.</p> <p>15 MR. GOLDEN: Mr. Translator,</p> <p>16 would you please translate that</p> <p>17 sentence into English.</p> <p>18 THE INTERPRETER: It says,</p> <p>19 "Knowledgeable people say that</p> <p>20 Egiazaryan and Zhirinovsky have a</p> <p>21 financial agreement for \$3</p> <p>22 million."</p> <p>23 Q. Do you know what that refers</p> <p>24 to, Mr. Egiazaryan?</p> <p>25 A. I don't know these</p>

30 (Pages 410 to 413)

1 ASHOT EGIAZARYAN
2 knowledgeable people.
3 **Q. Did you have financial**
4 **arrangements with him for \$3 million?**
5 A. As far as I understand, if I'm
6 wrong, please correct me, in 1999 in
7 order to appear number 17 or number 18 on
8 the list, I paid to Zhirinovsky, in the
9 words of these knowledgeable people, they
10 don't cite who those people were, money.
11 With all my responsibility, I can state
12 that this statement does not correspond
13 with the reality.
14 MR. GOLDEN: Mark this next.
15 (Exhibit 157 for
16 identification, article dated June
17 17, 2009.)
18 THE WITNESS: Are we done with
19 that document?
20 MR. GOLDEN: Yes.
21 **Q. Mr. Egiazaryan, what is the**
22 **title of this article?**
23 A. The new gazette deputy's
24 immunity.
25 THE INTERPRETER: I'm sorry,

1 ASHOT EGIAZARYAN
2 interpreter's remark. I think I
3 translated what this witness just
4 said, but it doesn't correspond
5 with the title of this article.
6 MR. GOLDEN: Please give your
7 translation of the article.
8 A. I beg your pardon, I just
9 didn't see that. The deputy's
10 nonparticipation. Yesterday at number 20
11 --
12 MR. GOLDEN: Excuse me, all I
13 did was ask you to read the title.
14 Are you finished with that?
15 THE INTERPRETER: Yes.
16 **Q. What's the date of the**
17 **article?**
18 A. 06/17/2009.
19 **Q. Have you seen this article**
20 **before?**
21 A. I don't remember. Maybe I've
22 read it.
23 **Q. Did you read it as part of**
24 **your preparation for this deposition?**
25 A. No.

1 ASHOT EGIAZARYAN
2 **Q. Did you read it -- do you**
3 **remember reading it in 2009?**
4 A. Maybe. Let me read it now and
5 I'll tell you.
6 **Q. Please read it. The article**
7 **refers to the seizure of documents at an**
8 **address 000 Daev Plaza. What is that**
9 **address?**
10 THE INTERPRETER: Your
11 question is what is Daev?
12 **Q. What is at that address?**
13 A. The offices of many companies
14 that rent premises there.
15 **Q. Do you own that building?**
16 A. No.
17 **Q. Does one of your companies own**
18 **that building?**
19 A. No.
20 **Q. Did you have offices at that**
21 **address?**
22 A. I rented space there. My
23 reception room rented premises there.
24 **Q. Does the first sentence of the**
25 **article say that you might lose your**

1 ASHOT EGIAZARYAN
2 **immunity?**
3 A. The first sentence?
4 **Q. Yes.**
5 A. Yes.
6 **Q. What's the date of this**
7 **article?**
8 A. 06/17/2009.
9 **Q. Does the article say that your**
10 **business turned bad even before troubles**
11 **with the Moscow Hotel?**
12 A. Please show me the place.
13 **Q. The second to last paragraph.**
14 A. What was the question? What
15 am I supposed to say?
16 **Q. Does that paragraph say that**
17 **you had business problems before the**
18 **problems with the Moscow Hotel?**
19 A. The article says that "The
20 same Deutsche Bank is entertaining views,
21 hopes not only for the Moscow Hotel, but
22 also on the trade center Europark, which
23 is located at the crossings of
24 Rublevskoe and MKAD. The bankruptcy of
25 the firm Tsentrion Alyans, to tell the

Rublyovka 31 (Pages 414 to 417)

<p style="text-align: right;">Page 418</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 truth, initiated the same company Daev</p> <p>3 Plaza, that would allow them to place</p> <p>4 their manager there."</p> <p>5 Now, this typical for the</p> <p>6 Russian capitalism scheme of removing the</p> <p>7 assets is under threat. This is what the</p> <p>8 article says.</p> <p>9 Q. Is the company 000 Daev Plaza</p> <p>10 one of your companies?</p> <p>11 A. The company 000 Daev Plaza is</p> <p>12 not my company.</p> <p>13 Q. Please read the last sentence</p> <p>14 of the article.</p> <p>15 A. "By the way, Ashot Egiazaryan</p> <p>16 already now is threatened with the recall</p> <p>17 of his deputy mandate, which will make</p> <p>18 legally possible under the law his</p> <p>19 presence on the defendant's bench."</p> <p>20 Q. Does that last sentence refer</p> <p>21 to the elimination of your Duma immunity?</p> <p>22 MR. LUPKIN: Objection. You</p> <p>23 may answer.</p> <p>24 A. This sentence refers to a</p> <p>25 threat of recalling Duma immunity.</p>	<p style="text-align: right;">Page 420</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 a psychiatric hospital?</p> <p>3 A. Yes, I have read about it.</p> <p>4 Well he was treated in a mad house.</p> <p>5 Q. When do you remember reading</p> <p>6 about that?</p> <p>7 A. I cannot tell you exactly.</p> <p>8 One can look it up in the internet.</p> <p>9 There would be no problem finding it.</p> <p>10 Q. Was he a member of The Duma</p> <p>11 during the time you were a member of the</p> <p>12 Duma?</p> <p>13 A. I think so. I think he was a</p> <p>14 deputy during a couple of -- during a</p> <p>15 couple of sessions, assemblies. He was</p> <p>16 member in the past assembly. I don't</p> <p>17 remember if he was in the one before</p> <p>18 that. I think he was. He was a deputy</p> <p>19 from, from the region of Nizhny Novgorod.</p> <p>20 Q. Please read the caption right</p> <p>21 beneath the photograph.</p> <p>22 A. Unfortunately I cannot.</p> <p>23 Q. You can't read that. Read the</p> <p>24 subtitle beneath that.</p> <p>25 A. "The deputy from the state</p>
<p style="text-align: right;">Page 419</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 MR. GOLDEN: Mark this next.</p> <p>3 (Exhibit 158 for</p> <p>4 identification, article dated</p> <p>5 November 24, 2011.)</p> <p>6 Q. Mr. Egiazaryan, have you seen</p> <p>7 the article that is Exhibit 158 before?</p> <p>8 A. No.</p> <p>9 Q. Will you please read the</p> <p>10 caption above the photograph.</p> <p>11 A. "Hinstein: The United Russia</p> <p>12 has a very short conversation with</p> <p>13 corrupted people. There should be none</p> <p>14 of them here."</p> <p>15 Q. Do you know who Mr. Hinstein</p> <p>16 is?</p> <p>17 A. Yes.</p> <p>18 Q. Who is he?</p> <p>19 A. As far as I know this is a</p> <p>20 member of the state Duma. Previously he</p> <p>21 was treated at the psychiatric and</p> <p>22 nervous hospital according to the</p> <p>23 statements in the press. He's a deputy</p> <p>24 from the fraction of United Russia.</p> <p>25 Q. Did you say he was treated at</p>	<p style="text-align: right;">Page 421</p> <p>1 ASHOT EGIAZARYAN</p> <p>2 Duma from the United Russia, a member of</p> <p>3 the general counsel of the party, took</p> <p>4 part in the TV debate on the subject how</p> <p>5 can we combat corruption in Russia."</p> <p>6 Q. From this article did you see</p> <p>7 did Zhirinovsky participate in this</p> <p>8 debate?</p> <p>9 A. Let me read it and probably</p> <p>10 I'll see it or I'll not see it.</p> <p>11 Q. Okay, please look at it.</p> <p>12 MR. GOLDEN: The videographer</p> <p>13 advises that we've hit our limits</p> <p>14 so I guess there won't be any</p> <p>15 questions about Exhibit 158.</p> <p>16 THE VIDEOGRAPHER: This will</p> <p>17 end tape 9 in the deposition of</p> <p>18 Ashot Egiazaryan. The time is 6:48</p> <p>19 p.m., we're off the record.</p> <p>20 MR. LUPKIN: Thank you very</p> <p>21 much, Mr. Golden. Given the</p> <p>22 expiration of the 14 hours, our</p> <p>23 view is the deposition is</p> <p>24 concluded.</p> <p>25 MR. GOLDEN: For today. I'm</p>

32 (Pages 418 to 421)

ASHOT EGIАЗARYAN - 1/19/2012

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1 ASHOT EGIАЗARYAN
 2 not waiving any right that I might
 3 have.
 4 MR. LUPKIN: You can preserve
 5 whatever you want and our view is
 6 that the deposition is finished.
 7 (Time noted: 6:49 p.m.)
 8
 9
 10 ASHOT EGIАЗARYAN
 11
 12 Subscribed and sworn to before me
 13 this ____ day of _____, 2012.
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

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1 NAME OF CASE: Egiazaryan v. Zalmayev
 2 DATE OF DEPOSITION: January 19, 2012
 3 NAME OF WITNESS: Ashot Egiazaryan
 4 I wish to make the following changes, for
 5 the following reasons:
 6 PAGE LINE
 7
 8 CHANGE: _____
 9 REASON: _____
 10
 11 CHANGE: _____
 12 REASON: _____
 13
 14 CHANGE: _____
 15 REASON: _____
 16
 17 CHANGE: _____
 18 REASON: _____
 19
 20 CHANGE: _____
 21 REASON: _____
 22
 23 CHANGE: _____
 24 REASON: _____
 25
 19 Subscribed and sworn to before me
 20 this ____ day of _____, 2012.
 21
 22
 23
 24 (Notary Public) My Commission Expires:
 25

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1 CERTIFICATE
 2 STATE OF NEW YORK)
 3 : ss.
 4 COUNTY OF NEW YORK)
 5
 6 I, GAIL F. SCHORR, a Certified
 7 Shorthand Reporter, Certified Realtime
 8 Reporter and Notary Public within and for
 9 the State of New York, do hereby certify:
 10 That ASHOT EGIАЗARYAN, the
 11 witness whose deposition is hereinbefore set
 12 forth, was duly sworn by me and that such
 13 deposition is a true record of the testimony
 14 given by the witness.
 15 I further certify that I am not
 16 related to any of the parties to this action
 17 by blood or marriage, and that I am in no
 18 way interested in the outcome of this
 19 matter.
 20 IN WITNESS WHEREOF, I have
 21 hereunto set my hand this ____ day of
 22 _____, 2012.
 23
 24
 25 GAIL F. SCHORR, C.S.R., C.R.R.

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1 EXHIBITS
 2
 3 DESCRIPTION PAGE LINE
 4 (Exhibit 144 for 234 16
 5 identification, Bates
 6 stamped PZ 003439, 3418 and
 7 3415.)
 8 (Exhibit 145 for 242 13
 9 identification, Bates
 10 stamped PZ 003738 through
 11 3783.)
 12 (Exhibit 146 for 274 25
 13 identification, Bates
 14 stamped EA-0000026 through
 15 29 and 20 through 25.)
 16 (Exhibit 147 for 287 15
 17 identification, Bates
 18 stamped PZ 00393 through
 19 405.)
 20 (Exhibit 148 for 289 17
 21 identification, Bates
 22 stamped PZ 000406 through
 23 413.)
 24
 25

33 (Pages 422 to 425)

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Page 426			
1	(Exhibit 149 for	293	8
2	identification, article in		
3	Novaya Gazeta.)		
4	(Exhibit 150 for	385	8
5	identification, Bates		
6	stamped PZ 000513 through		
7	516.)		
8	(Exhibit 151 for	387	15
9	identification, Bates		
10	stamped PZ 000493 through		
11	496.)		
12	(Exhibit 152 for	389	6
13	identification, Bates		
14	stamped PZ 000491 through		
15	492.)		
16	(Exhibit 153 for	396	21
17	identification, Bates		
18	stamped PZ 001635 through		
19	1634.)		
20	(Exhibit 154 for	397	12
21	identification, Bates		
22	stamped PZ 000478 through		
23	480.)		
24			
25			
Page 427			
1	(Exhibit 155 for	398	18
2	identification, article from		
3	the Associated Press dated		
4	February 7, 2005.)		
5	(Exhibit 156 for	406	9
6	identification, article		
7	dated 2001.)		
8	(Exhibit 157 for	414	15
9	identification, article		
10	dated June 17, 2009.)		
11	(Exhibit 158 for	419	3
12	identification, article		
13	dated November 24, 2011.)		
14			
15			
16			
17			
18	(Instruction not to answer.)	378	6
19	(Instruction not to answer.)	404	25
20			
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23			
24			
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34 (Pages 426 to 427)

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